Executive Summary – Enforcement Matter – Case No. 42535
Eastman Chemical Company
RN100219815
Docket No. 2011-1691-AIR-E

Order Type:
1660 Agreed Order
Findings Order Justification:
N/A
Media:
AIR
Small Business:
No
Location(s) Where Violation(s) Occurred:
Eastman Chemical Company Texas Operations, 300 Kodak Boulevard, Longview, Harrison County
Type of Operation:
Chemical manufacturing plant
Other Significant Matters:
Additional Pending Enforcement Actions: Yes, Docket No. 2011-2228-AIR-E
Past-Due Penalties: No
Other: N/A
Interested Third-Parties: None
Texas Register Publication Date: January 13, 2012
Comments Received: No

Penalty Information

Total Penalty Assessed: $64,533
Amount Deferred for Expedited Settlement: $12,906
Amount Deferred for Financial Inability to Pay: $0
Total Paid to General Revenue: $25,814
Total Due to General Revenue: $0
Payment Plan: N/A
SEP Conditional Offset: $25,813
Name of SEP: Texas PTA - Texas PTA Clean School Buses
Compliance History Classifications:
Person/CN - Average
Site/RN - Average
Major Source: Yes
Statutory Limit Adjustment: N/A
Applicable Penalty Policy: September 2002

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Eastman Chemical Company
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Docket No. 2011-1691-AIR-E

Investigation Information

Complaint Date(s): N/A
Complaint Information: N/A
Date(s) of Investigation: July 25, 2011
Date(s) of NOE(s): August 10, 2011

Violation Information

Failed to prevent unauthorized emissions during an emissions event (Incident No. 154284) that was discovered on May 8, 2011. Specifically, during startup on February 19, 2011, a vent valve was not aligned to vent the Ethylene Oxide Refining Column emissions to the residual system and back to the process. The emissions are estimated to be 16,969 pounds of ethylene oxide. Because the event could have been avoided by better operating practices, the Respondent did not meet the affirmative defense in 30 TEX. ADMIN. CODE § 101.222 [30 TEX. ADMIN. CODE §§ 116.115(c) and 122.143(4), New Source Review Permit No. 1329 Special Conditions No. 1; Federal Operating Permit No. O-01974 Special Terms and Conditions No. 8, and TEX. HEALTH & SAFETY CODE § 382.085(b)].

Corrective Actions/Technical Requirements

Corrective Action(s) Completed:

The Respondent has implemented the following corrective measures at the Plant:

a. By August 4, 2011, car-sealed the vent valve and added the valve to the car-seal checklist requiring that it must be closed and checked off prior to startup;

b. By August 4, 2011, relocated the vent valve from the residual system checklist to the D-509 bleed valve checklist to improve communications;

c. By August 4, 2011, provided additional training to the operators to ensure that valve positions are recorded properly in the bleed valve checklists and to emphasize communication of items that are not completed on the bleed valve checklists; and

d. By August 5, 2011, changed the log book recording process to improve communications of critical process information during turnarounds.

Technical Requirements:

The Order will require the Respondent to implement and complete a Supplemental Environmental Project ("SEP"). (See SEP Attachment A)

Litigation Information

Date Petition(s) Filed: N/A
Date Answer(s) Filed: N/A
SOAH Referral Date: N/A

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Hearing Date(s): N/A
Settlement Date: N/A

Contact Information

TCEQ Attorney: N/A
TCEQ Enforcement Coordinator: Miriam Hall, Enforcement Division, Enforcement Team 4, MC 149, (512) 239-1044; Debra Barber, Enforcement Division, MC 219, (512) 239-0412
TCEQ SEP Coordinator: Stuart Beckley, SEP Coordinator, Enforcement Division, MC 219, (512) 239-3565
Respondent: C. David Crouch, Superintendent, TXO Chemicals Division, Eastman Chemical Company, P.O. Box 7444, Longview, Texas 75607
Stancy Simpson, Manager, Environmental Affairs, Eastman Chemical Company, P.O. Box 7444, Longview, Texas 75607
Respondent's Attorney: N/A

Attachment A
Docket Number: 2011-1691-AIR-E

SUPPLEMENTAL ENVIRONMENTAL PROJECT

Respondent:	**Eastman Chemical Company**
Penalty Amount:	**Fifty-One Thousand Six Hundred Twenty-Seven Dollars ($51,627)**
SEP Offset Amount:	**Twenty-Five Thousand Eight Hundred Thirteen Dollars ($25,813)**
Type of SEP:	**Pre-approved**
Third-Party Recipient:	**Texas PTA – *Texas PTA Clean School Buses***
Location of SEP:	**Texas Air Quality Control Region 022 – Shreveport – Texarkana - Tyler**

The Texas Commission on Environmental Quality ("TCEQ") agrees to offset a portion of the administrative Penalty Amount assessed in this Agreed Order for the Respondent to contribute to a Supplemental Environmental Project ("SEP"). The offset is equal to the SEP Offset Amount set forth above and is conditioned upon completion of the project in accordance with the terms of this Attachment A.

1. Project Description

A. Project

The Respondent shall contribute the SEP Offset Amount to the Third-Party Recipient named above. The contribution will be to **Texas PTA** for the *Texas PTA Clean School Bus Program* as set forth in an agreement between the Third-Party Recipient and the TCEQ. Specifically, the contribution will be used to reimburse local school districts for the cost of the following activities to reduce emissions: 1) replacing older diesel buses with alternative fueled or clean diesel buses; or 2) retrofitting older diesel buses with new, cleaner technology. All dollars contributed will be used solely for the direct cost of the project and no portion will be spent on administrative costs. The SEP will be done in accordance with all federal, state and local environmental laws and regulations.

The Respondent certifies that it has no prior commitment to make this contribution and that it is being done solely in an effort to settle this enforcement action.

B. Environmental Benefit

This SEP will provide a discernible environmental benefit by reducing particulate emissions from buses by more than 90% below today's level and by reducing hydrocarbons.

C. Minimum Expenditure

The Respondent shall contribute at least the SEP Offset Amount to the Third-Party Recipient and comply with all other provisions of this SEP.

2. Performance Schedule

Within 30 days after the effective date of this Agreed Order, the Respondent must contribute the SEP Offset Amount to the Third-Party Recipient. The Respondent shall mail a copy of the Agreed Order with the contribution to:

Director of Finance
Texas PTA
408 West 11th Street
Austin, Texas 78701

3. Records and Reporting

Concurrent with the payment of the SEP Offset Amount, the Respondent shall provide the Enforcement Division SEP Coordinator with a copy of the check and transmittal letter indicating full payment of the SEP Offset Amount to the Third-Party Recipient. The Respondent shall mail a copy of the check and transmittal letter to:

Enforcement Division
Attention: SEP Coordinator, MC 219
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, Texas 78711-3087

4. Failure to Fully Perform

If the Respondent does not perform its obligations under this SEP in any way, including full expenditure of the SEP Offset Amount and submittal of the required reporting described in Section 3 above, the Executive Director may require immediate payment of all or part of the SEP Offset Amount.

In the event of incomplete performance, the Respondent shall include on the check the docket number of this Agreed Order and a note that it is for reimbursement of a SEP. The Respondent shall make the payment for the amount due to "Texas Commission on Environmental Quality" and mail it to:

Litigation Division
Attention: SEP Coordinator, MC 175
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, Texas 78711-3087

5. Publicity

Any public statements concerning this SEP made by or on behalf of the Respondent must include a clear statement that the project was performed as part of the settlement of an enforcement action brought by the TCEQ. Such statements include advertising, public relations, and press releases.

6. Clean Texas Program

The Respondent shall not include this SEP in any application made to TCEQ under the "Clean Texas" (or any successor) program(s). Similarly, the Respondent may not seek recognition for this contribution in any other state or federal regulatory program.

7. Other SEPs by TCEQ or Other Agencies

The SEP identified in this Agreed Order has not been, and shall not be, included as a SEP for the Respondent under any other Agreed Order negotiated with the TCEQ or any other agency of the state or federal government.

Penalty Calculation Worksheet (PCW)

Policy Revision 2 (September 2002) — *PCW Revision October 30, 2008*

TCEQ

DATES						
Assigned	15-Aug-2011					
PCW	15-Sep-2011	**Screening**	15-Sep-2011	**EPA Due**	6-May-2012	

RESPONDENT/FACILITY INFORMATION			
Respondent	Eastman Chemical Company		
Reg. Ent. Ref. No.	RN100219815		
Facility/Site Region	5-Tyler	**Major/Minor Source**	Major

CASE INFORMATION			
Enf./Case ID No.	42535	**No. of Violations**	1
Docket No.	2011-1691-AIR-E	**Order Type**	1660
Media Program(s)	Air	**Government/Non-Profit**	No
Multi-Media		**Enf. Coordinator**	Miriam Hall
		EC's Team	Enforcement Team 4

Admin. Penalty $ Limit Minimum $0 Maximum $10,000

Penalty Calculation Section

TOTAL BASE PENALTY (Sum of violation base penalties) — *Subtotal 1*: **$15,000**

ADJUSTMENTS (+/-) TO SUBTOTAL 1

Subtotals 2-7 are obtained by multiplying the Total Base Penalty (Subtotal 1) by the indicated percentage.

Compliance History — **347.0%** Enhancement — *Subtotals 2, 3, & 7*: **$52,050**

Notes: Enhancement for 15 NOVs with the same/similar violations, 43 NOVs with dissimilar violations, and 11 agreed orders with denial of liability. Reduction for 12 Notices of Intent to conduct an audit, six Disclosures of Violations, and an environmental management system.

Culpability — No — **0.0%** Enhancement — *Subtotal 4*: **$0**

Notes: The Respondent does not meet the culpability criteria.

Good Faith Effort to Comply Total Adjustments — *Subtotal 5*: **$3,750**

Economic Benefit — **0.0%** Enhancement* — *Subtotal 6*: **$0**

Total EB Amounts $24
Approx. Cost of Compliance $1,025

**Capped at the Total EB $ Amount*

SUM OF SUBTOTALS 1-7 — *Final Subtotal*: **$63,300**

OTHER FACTORS AS JUSTICE MAY REQUIRE — **1.9%** — *Adjustment*: **$1,233**

Reduces or enhances the Final Subtotal by the indicated percentage.

Notes:

Final Penalty Amount: **$64,533**

STATUTORY LIMIT ADJUSTMENT — *Final Assessed Penalty*: **$64,533**

DEFERRAL — **20.0%** Reduction — *Adjustment*: **-$12,906**

Reduces the Final Assessed Penalty by the indicted percentage. *(Enter number only; e.g. 20 for 20% reduction.)*

Notes: Deferral offered for expedited settlement.

PAYABLE PENALTY: **$51,627**

Screening Date 15-Sep-2011 **Docket No.** 2011-1691-AIR-E **PCW**

Respondent Eastman Chemical Company

Case ID No. 42535

Reg. Ent. Reference No. RN100219815

Media [Statute] Air

Enf. Coordinator Miriam Hall

Policy Revision 2 (September 2002)

PCW Revision October 30, 2008

Compliance History Worksheet

>> Compliance History *Site* Enhancement (Subtotal 2)

Component	Number of...	Enter Number Here	Adjust.
NOVs	Written notices of violation ("NOVs") with same or similar violations as those in the current enforcement action (*number of NOVs meeting criteria*)	15	75%
	Other written NOVs	43	86%
Orders	Any agreed final enforcement orders containing a denial of liability (*number of orders meeting criteria*)	11	220%
	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission	0	0%
Judgments and Consent Decrees	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (*number of judgements or consent decrees meeting criteria*)	0	0%
	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	0	0%
Convictions	Any criminal convictions of this state or the federal government (*number of counts*)	0	0%
Emissions	Chronic excessive emissions events (*number of events*)	0	0%
Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 *(number of audits for which notices were submitted)*	12	-12%
	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (*number of audits for which violations were disclosed*)	6	-12%

		Please Enter Yes or No	
Other	Environmental management systems in place for one year or more	Yes	-10%
	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%
	Participation in a voluntary pollution reduction program	No	0%
	Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%

Adjustment Percentage (Subtotal 2) 347%

>> Repeat Violator (Subtotal 3)

No

Adjustment Percentage (Subtotal 3) 0%

>> Compliance History Person Classification (Subtotal 7)

Average Performer

Adjustment Percentage (Subtotal 7) 0%

>> Compliance History Summary

Compliance History Notes

Enhancement for 15 NOVs with the same/similar violations, 43 NOVs with dissimilar violations, and 11 agreed orders with denial of liability. Reduction for 12 Notices of Intent to conduct an audit, six Disclosures of Violations, and an environmental management system.

Total Adjustment Percentage (Subtotals 2, 3, & 7) 347%

Screening Date 15-Sep-2011 **Docket No.** 2011-1691-AIR-E **PCW**

Respondent Eastman Chemical Company *Policy Revision 2 (September 2002)*

Case ID No. 42535 *PCW Revision October 30, 2008*

Reg. Ent. Reference No. RN100219815

Media [Statute] Air

Enf. Coordinator Miriam Hall

Violation Number 1

Rule Cite(s) 30 Tex. Admin. Code §§ 116.115(c) and 122.143(4), New Source Review Permit No. 1329 Special Conditions No. 1; Federal Operating Permit No. O-01974 Special Terms and Conditions No. 8, and Tex. Health & Safety Code § 382.085(b)

Violation Description Failed to prevent unauthorized emissions during an emissions event (Incident No. 154284) that was discovered on May 8, 2011. Specifically, during startup on February 19, 2011, a vent valve was not aligned to vent the Ethylene Oxide Refining Column emissions to the residual system and back to the process. The emissions are estimated to be 16,969 pounds of ethylene oxide. Because the event could have been avoided by better operating practices, the Respondent did not meet the affirmative defense in 30 Tex. Admin. Code § 101.222.

Base Penalty $10,000

>> Environmental, Property and Human Health Matrix

OR

Release	Harm: Major	Moderate	Minor
Actual		x	
Potential			

Percent 50%

>>Programmatic Matrix

Falsification	Major	Moderate	Minor

Percent 0%

Matrix Notes: Human health or the environment has been exposed to significant amounts of pollutants which do not exceed levels that are protective of human health or environmental receptors as a result of this violation.

Adjustment $5,000

$5,000

Violation Events

Number of Violation Events: 3 — 78 Number of violation days

mark only one with an x

daily	
weekly	
monthly	x
quarterly	
semiannual	
annual	
single event	

Violation Base Penalty $15,000

Three monthly events are recommended from February 19, 2011, the start date of the emissions event, through May 8, 2011, the end date of the emissions event.

Good Faith Efforts to Comply

25.0% Reduction — $3,750

	Before NOV	NOV to EDPRP/Settlement Offer
Extraordinary		
Ordinary	x	
N/A		(mark with x)

Notes: Corrective actions were completed on August 5, 2011, and the NOE was issued on August 10, 2011.

Violation Subtotal $11,250

Economic Benefit (EB) for this violation

Estimated EB Amount $24

Statutory Limit Test

Violation Final Penalty Total $64,533

This violation Final Assessed Penalty (adjusted for limits) $64,533

Economic Benefit Worksheet

Respondent Eastman Chemical Company
Case ID No. 42535
Req. Ent. Reference No. RN100219815
Media Air
Violation No. 1

Percent Interest	Years of Depreciation
5.0	15

Item Description (No commas or $)	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Delayed Costs							
Equipment	$25	19-Feb-2011	4-Aug-2011	0.45	$0	$1	$1
Buildings				0.00	$0	$0	$0
Other (as needed)				0.00	$0	$0	$0
Engineering/construction				0.00	$0	$0	$0
Land				0.00	$0	n/a	$0
Record Keeping System				0.00	$0	n/a	$0
Training/Sampling	$500	19-Feb-2011	4-Aug-2011	0.45	$11	n/a	$11
Remediation/Disposal				0.00	$0	n/a	$0
Permit Costs				0.00	$0	n/a	$0
Other (as needed)	$500	19-Feb-2011	5-Aug-2011	0.46	$11	n/a	$11
Notes for DELAYED costs	The estimated cost for car-sealing the valve, training and changing standard operating procedures to prevent the recurrence of the violation from the first date of the violation to the date corrective actions were completed.						
Avoided Costs	ANNUALIZE [1] avoided costs before entering item (except for one-time avoided costs)						
Disposal				0.00	$0	$0	$0
Personnel				0.00	$0	$0	$0
Inspection/Reporting/Sampling				0.00	$0	$0	$0
Supplies/equipment				0.00	$0	$0	$0
Financial Assurance [2]				0.00	$0	$0	$0
ONE-TIME avoided costs [3]				0.00	$0	$0	$0
Other (as needed)				0.00	$0	$0	$0
Notes for AVOIDED costs							

Approx. Cost of Compliance $1,025

TOTAL $24

Compliance History

Customer/Respondent/Owner-Operator: CN601214406 Eastman Chemical Company Classification: AVERAGE Rating: 3.34

Regulated Entity: RN100219815 EASTMAN CHEMICAL COMPANY TEXAS OPERATIONS Classification: AVERAGE Site Rating: 7.21

ID Number(s):

INDUSTRIAL AND HAZARDOUS WASTE	PERMIT	50043
INDUSTRIAL AND HAZARDOUS WASTE	EPA ID	TXD007330202
INDUSTRIAL AND HAZARDOUS WASTE	SOLID WASTE REGISTRATION # (SWR)	30137
AIR OPERATING PERMITS	ACCOUNT NUMBER	HH0042M
AIR OPERATING PERMITS	PERMIT	1436
AIR OPERATING PERMITS	PERMIT	1967
AIR OPERATING PERMITS	PERMIT	1968
AIR OPERATING PERMITS	PERMIT	1969
AIR OPERATING PERMITS	PERMIT	1970
AIR OPERATING PERMITS	PERMIT	1971
AIR OPERATING PERMITS	PERMIT	1972
AIR OPERATING PERMITS	PERMIT	1973
AIR OPERATING PERMITS	PERMIT	1974
AIR OPERATING PERMITS	PERMIT	1975
AIR OPERATING PERMITS	PERMIT	1976
AIR OPERATING PERMITS	PERMIT	1977
AIR OPERATING PERMITS	PERMIT	1978
AIR OPERATING PERMITS	PERMIT	1979
AIR OPERATING PERMITS	PERMIT	1981
AIR OPERATING PERMITS	PERMIT	1982
AIR OPERATING PERMITS	PERMIT	1983
AIR NEW SOURCE PERMITS	REGISTRATION	93530
AIR NEW SOURCE PERMITS	REGISTRATION	93524
AIR NEW SOURCE PERMITS	REGISTRATION	94102
AIR NEW SOURCE PERMITS	REGISTRATION	93983
AIR NEW SOURCE PERMITS	REGISTRATION	93933
AIR NEW SOURCE PERMITS	REGISTRATION	93551
AIR NEW SOURCE PERMITS	REGISTRATION	93913
AIR NEW SOURCE PERMITS	REGISTRATION	93763
AIR NEW SOURCE PERMITS	REGISTRATION	94362
AIR NEW SOURCE PERMITS	REGISTRATION	94602
AIR NEW SOURCE PERMITS	REGISTRATION	92785
AIR NEW SOURCE PERMITS	REGISTRATION	91692
AIR NEW SOURCE PERMITS	REGISTRATION	92732
AIR NEW SOURCE PERMITS	REGISTRATION	92769
AIR NEW SOURCE PERMITS	REGISTRATION	92751
AIR NEW SOURCE PERMITS	REGISTRATION	92766
AIR NEW SOURCE PERMITS	REGISTRATION	92127
AIR NEW SOURCE PERMITS	REGISTRATION	91571
AIR NEW SOURCE PERMITS	REGISTRATION	92783
AIR NEW SOURCE PERMITS	EPA ID	HAP61
AIR NEW SOURCE PERMITS	REGISTRATION	92438
AIR NEW SOURCE PERMITS	PERMIT	92682
AIR NEW SOURCE PERMITS	REGISTRATION	91850
AIR NEW SOURCE PERMITS	REGISTRATION	72214
AIR NEW SOURCE PERMITS	PERMIT	681
AIR NEW SOURCE PERMITS	PERMIT	908
AIR NEW SOURCE PERMITS	PERMIT	1105
AIR NEW SOURCE PERMITS	PERMIT	1143
AIR NEW SOURCE PERMITS	PERMIT	1329
AIR NEW SOURCE PERMITS	PERMIT	2102
AIR NEW SOURCE PERMITS	PERMIT	5283
AIR NEW SOURCE PERMITS	PERMIT	6419
AIR NEW SOURCE PERMITS	PERMIT	6772
AIR NEW SOURCE PERMITS	PERMIT	6777
AIR NEW SOURCE PERMITS	PERMIT	7022
AIR NEW SOURCE PERMITS	PERMIT	7023
AIR NEW SOURCE PERMITS	PERMIT	7416
AIR NEW SOURCE PERMITS	PERMIT	7752
AIR NEW SOURCE PERMITS	PERMIT	8539

AIR NEW SOURCE PERMITS	PERMIT	9167
AIR NEW SOURCE PERMITS	PERMIT	9301
AIR NEW SOURCE PERMITS	PERMIT	9552
AIR NEW SOURCE PERMITS	PERMIT	9631
AIR NEW SOURCE PERMITS	REGISTRATION	11243
AIR NEW SOURCE PERMITS	PERMIT	12367
AIR NEW SOURCE PERMITS	REGISTRATION	13510
AIR NEW SOURCE PERMITS	REGISTRATION	13743
AIR NEW SOURCE PERMITS	REGISTRATION	14137
AIR NEW SOURCE PERMITS	REGISTRATION	14558
AIR NEW SOURCE PERMITS	REGISTRATION	14953
AIR NEW SOURCE PERMITS	REGISTRATION	15392
AIR NEW SOURCE PERMITS	REGISTRATION	15535
AIR NEW SOURCE PERMITS	REGISTRATION	15691
AIR NEW SOURCE PERMITS	REGISTRATION	15724
AIR NEW SOURCE PERMITS	REGISTRATION	16022
AIR NEW SOURCE PERMITS	REGISTRATION	16485
AIR NEW SOURCE PERMITS	PERMIT	17578
AIR NEW SOURCE PERMITS	PERMIT	17579
AIR NEW SOURCE PERMITS	PERMIT	17833
AIR NEW SOURCE PERMITS	PERMIT	18528
AIR NEW SOURCE PERMITS	PERMIT	19230
AIR NEW SOURCE PERMITS	PERMIT	20489
AIR NEW SOURCE PERMITS	PERMIT	20567
AIR NEW SOURCE PERMITS	REGISTRATION	21315
AIR NEW SOURCE PERMITS	PERMIT	21832
AIR NEW SOURCE PERMITS	REGISTRATION	24461
AIR NEW SOURCE PERMITS	PERMIT	27941
AIR NEW SOURCE PERMITS	REGISTRATION	26307
AIR NEW SOURCE PERMITS	REGISTRATION	27086
AIR NEW SOURCE PERMITS	REGISTRATION	26973
AIR NEW SOURCE PERMITS	REGISTRATION	28548
AIR NEW SOURCE PERMITS	PERMIT	30130
AIR NEW SOURCE PERMITS	REGISTRATION	29676
AIR NEW SOURCE PERMITS	REGISTRATION	30643
AIR NEW SOURCE PERMITS	REGISTRATION	31038
AIR NEW SOURCE PERMITS	REGISTRATION	33574
AIR NEW SOURCE PERMITS	REGISTRATION	35254
AIR NEW SOURCE PERMITS	REGISTRATION	35597
AIR NEW SOURCE PERMITS	REGISTRATION	37813
AIR NEW SOURCE PERMITS	REGISTRATION	37878
AIR NEW SOURCE PERMITS	REGISTRATION	38305
AIR NEW SOURCE PERMITS	REGISTRATION	39472
AIR NEW SOURCE PERMITS	REGISTRATION	39774
AIR NEW SOURCE PERMITS	REGISTRATION	40744
AIR NEW SOURCE PERMITS	REGISTRATION	41365
AIR NEW SOURCE PERMITS	REGISTRATION	43023
AIR NEW SOURCE PERMITS	REGISTRATION	43150
AIR NEW SOURCE PERMITS	REGISTRATION	42273
AIR NEW SOURCE PERMITS	REGISTRATION	44705
AIR NEW SOURCE PERMITS	REGISTRATION	45169
AIR NEW SOURCE PERMITS	REGISTRATION	45168
AIR NEW SOURCE PERMITS	REGISTRATION	45164
AIR NEW SOURCE PERMITS	REGISTRATION	45203
AIR NEW SOURCE PERMITS	REGISTRATION	45369
AIR NEW SOURCE PERMITS	REGISTRATION	46257
AIR NEW SOURCE PERMITS	REGISTRATION	47044
AIR NEW SOURCE PERMITS	REGISTRATION	47232
AIR NEW SOURCE PERMITS	REGISTRATION	47934
AIR NEW SOURCE PERMITS	REGISTRATION	48119
AIR NEW SOURCE PERMITS	REGISTRATION	46672
AIR NEW SOURCE PERMITS	REGISTRATION	48390
AIR NEW SOURCE PERMITS	PERMIT	48588
AIR NEW SOURCE PERMITS	PERMIT	48589
AIR NEW SOURCE PERMITS	PERMIT	48590
AIR NEW SOURCE PERMITS	PERMIT	48591
AIR NEW SOURCE PERMITS	PERMIT	48615

AIR NEW SOURCE PERMITS	PERMIT	48617
AIR NEW SOURCE PERMITS	PERMIT	48758
AIR NEW SOURCE PERMITS	REGISTRATION	48776
AIR NEW SOURCE PERMITS	PERMIT	48655
AIR NEW SOURCE PERMITS	REGISTRATION	49497
AIR NEW SOURCE PERMITS	REGISTRATION	49567
AIR NEW SOURCE PERMITS	PERMIT	49363
AIR NEW SOURCE PERMITS	REGISTRATION	49793
AIR NEW SOURCE PERMITS	REGISTRATION	50067
AIR NEW SOURCE PERMITS	REGISTRATION	49989
AIR NEW SOURCE PERMITS	REGISTRATION	50167
AIR NEW SOURCE PERMITS	REGISTRATION	50110
AIR NEW SOURCE PERMITS	REGISTRATION	50321
AIR NEW SOURCE PERMITS	ACCOUNT NUMBER	HH0042M
AIR NEW SOURCE PERMITS	REGISTRATION	52785
AIR NEW SOURCE PERMITS	REGISTRATION	93166
AIR NEW SOURCE PERMITS	REGISTRATION	55268
AIR NEW SOURCE PERMITS	REGISTRATION	55267
AIR NEW SOURCE PERMITS	REGISTRATION	55550
AIR NEW SOURCE PERMITS	REGISTRATION	75233
AIR NEW SOURCE PERMITS	REGISTRATION	75913
AIR NEW SOURCE PERMITS	REGISTRATION	75921
AIR NEW SOURCE PERMITS	REGISTRATION	75578
AIR NEW SOURCE PERMITS	REGISTRATION	75700
AIR NEW SOURCE PERMITS	REGISTRATION	75701
AIR NEW SOURCE PERMITS	REGISTRATION	76268
AIR NEW SOURCE PERMITS	REGISTRATION	76267
AIR NEW SOURCE PERMITS	REGISTRATION	76096
AIR NEW SOURCE PERMITS	REGISTRATION	55899
AIR NEW SOURCE PERMITS	REGISTRATION	75396
AIR NEW SOURCE PERMITS	REGISTRATION	75584
AIR NEW SOURCE PERMITS	REGISTRATION	70116
AIR NEW SOURCE PERMITS	REGISTRATION	70117
AIR NEW SOURCE PERMITS	REGISTRATION	70010
AIR NEW SOURCE PERMITS	AFS NUM	4820300019
AIR NEW SOURCE PERMITS	REGISTRATION	70543
AIR NEW SOURCE PERMITS	REGISTRATION	70477
AIR NEW SOURCE PERMITS	REGISTRATION	70196
AIR NEW SOURCE PERMITS	PERMIT	48626
AIR NEW SOURCE PERMITS	PERMIT	48761
AIR NEW SOURCE PERMITS	PERMIT	49078
AIR NEW SOURCE PERMITS	PERMIT	52985
AIR NEW SOURCE PERMITS	REGISTRATION	70379
AIR NEW SOURCE PERMITS	REGISTRATION	70288
AIR NEW SOURCE PERMITS	REGISTRATION	56590
AIR NEW SOURCE PERMITS	REGISTRATION	71012
AIR NEW SOURCE PERMITS	REGISTRATION	71013
AIR NEW SOURCE PERMITS	REGISTRATION	71014
AIR NEW SOURCE PERMITS	REGISTRATION	71015
AIR NEW SOURCE PERMITS	REGISTRATION	70772
AIR NEW SOURCE PERMITS	REGISTRATION	70884
AIR NEW SOURCE PERMITS	REGISTRATION	70823
AIR NEW SOURCE PERMITS	REGISTRATION	71349
AIR NEW SOURCE PERMITS	REGISTRATION	71352
AIR NEW SOURCE PERMITS	EPA ID	PSDTX332M3
AIR NEW SOURCE PERMITS	REGISTRATION	71472
AIR NEW SOURCE PERMITS	REGISTRATION	71384
AIR NEW SOURCE PERMITS	REGISTRATION	71332
AIR NEW SOURCE PERMITS	REGISTRATION	50614
AIR NEW SOURCE PERMITS	REGISTRATION	50819
AIR NEW SOURCE PERMITS	REGISTRATION	50871
AIR NEW SOURCE PERMITS	REGISTRATION	52440
AIR NEW SOURCE PERMITS	REGISTRATION	54111
AIR NEW SOURCE PERMITS	REGISTRATION	50649
AIR NEW SOURCE PERMITS	REGISTRATION	54325
AIR NEW SOURCE PERMITS	REGISTRATION	53062
AIR NEW SOURCE PERMITS	REGISTRATION	53064

AIR NEW SOURCE PERMITS	REGISTRATION	54199
AIR NEW SOURCE PERMITS	REGISTRATION	56335
AIR NEW SOURCE PERMITS	REGISTRATION	56330
AIR NEW SOURCE PERMITS	REGISTRATION	53918
AIR NEW SOURCE PERMITS	REGISTRATION	53998
AIR NEW SOURCE PERMITS	REGISTRATION	53967
AIR NEW SOURCE PERMITS	REGISTRATION	72364
AIR NEW SOURCE PERMITS	REGISTRATION	51365
AIR NEW SOURCE PERMITS	REGISTRATION	71713
AIR NEW SOURCE PERMITS	REGISTRATION	54232
AIR NEW SOURCE PERMITS	REGISTRATION	54495
AIR NEW SOURCE PERMITS	REGISTRATION	56239
AIR NEW SOURCE PERMITS	REGISTRATION	71373
AIR NEW SOURCE PERMITS	REGISTRATION	71168
AIR NEW SOURCE PERMITS	REGISTRATION	70851
AIR NEW SOURCE PERMITS	REGISTRATION	71356
AIR NEW SOURCE PERMITS	REGISTRATION	72607
AIR NEW SOURCE PERMITS	REGISTRATION	51004
AIR NEW SOURCE PERMITS	REGISTRATION	51005
AIR NEW SOURCE PERMITS	REGISTRATION	51006
AIR NEW SOURCE PERMITS	REGISTRATION	54130
AIR NEW SOURCE PERMITS	REGISTRATION	53789
AIR NEW SOURCE PERMITS	REGISTRATION	73184
AIR NEW SOURCE PERMITS	REGISTRATION	72549
AIR NEW SOURCE PERMITS	REGISTRATION	56589
AIR NEW SOURCE PERMITS	REGISTRATION	56577
AIR NEW SOURCE PERMITS	REGISTRATION	56575
AIR NEW SOURCE PERMITS	REGISTRATION	56560
AIR NEW SOURCE PERMITS	REGISTRATION	56558
AIR NEW SOURCE PERMITS	REGISTRATION	56555
AIR NEW SOURCE PERMITS	REGISTRATION	56540
AIR NEW SOURCE PERMITS	REGISTRATION	56518
AIR NEW SOURCE PERMITS	REGISTRATION	72608
AIR NEW SOURCE PERMITS	REGISTRATION	53856
AIR NEW SOURCE PERMITS	REGISTRATION	52062
AIR NEW SOURCE PERMITS	REGISTRATION	50980
AIR NEW SOURCE PERMITS	REGISTRATION	72295
AIR NEW SOURCE PERMITS	REGISTRATION	73042
AIR NEW SOURCE PERMITS	REGISTRATION	56071
AIR NEW SOURCE PERMITS	REGISTRATION	50374
AIR NEW SOURCE PERMITS	REGISTRATION	55338
AIR NEW SOURCE PERMITS	REGISTRATION	50421
AIR NEW SOURCE PERMITS	REGISTRATION	74022
AIR NEW SOURCE PERMITS	REGISTRATION	72622
AIR NEW SOURCE PERMITS	REGISTRATION	74168
AIR NEW SOURCE PERMITS	REGISTRATION	73903
AIR NEW SOURCE PERMITS	REGISTRATION	72893
AIR NEW SOURCE PERMITS	REGISTRATION	74118
AIR NEW SOURCE PERMITS	REGISTRATION	74120
AIR NEW SOURCE PERMITS	REGISTRATION	74121
AIR NEW SOURCE PERMITS	REGISTRATION	74094
AIR NEW SOURCE PERMITS	REGISTRATION	73753
AIR NEW SOURCE PERMITS	REGISTRATION	73940
AIR NEW SOURCE PERMITS	REGISTRATION	74548
AIR NEW SOURCE PERMITS	REGISTRATION	74502
AIR NEW SOURCE PERMITS	REGISTRATION	74686
AIR NEW SOURCE PERMITS	REGISTRATION	74685
AIR NEW SOURCE PERMITS	REGISTRATION	74683
AIR NEW SOURCE PERMITS	REGISTRATION	74257
AIR NEW SOURCE PERMITS	REGISTRATION	74174
AIR NEW SOURCE PERMITS	REGISTRATION	75102
AIR NEW SOURCE PERMITS	REGISTRATION	74812
AIR NEW SOURCE PERMITS	REGISTRATION	74985
AIR NEW SOURCE PERMITS	REGISTRATION	76412
AIR NEW SOURCE PERMITS	REGISTRATION	76807
AIR NEW SOURCE PERMITS	REGISTRATION	77693
AIR NEW SOURCE PERMITS	REGISTRATION	77205

AIR NEW SOURCE PERMITS	REGISTRATION	77203
AIR NEW SOURCE PERMITS	REGISTRATION	88579
AIR NEW SOURCE PERMITS	REGISTRATION	77367
AIR NEW SOURCE PERMITS	REGISTRATION	76860
AIR NEW SOURCE PERMITS	REGISTRATION	77966
AIR NEW SOURCE PERMITS	REGISTRATION	78125
AIR NEW SOURCE PERMITS	REGISTRATION	78090
AIR NEW SOURCE PERMITS	REGISTRATION	78085
AIR NEW SOURCE PERMITS	REGISTRATION	78086
AIR NEW SOURCE PERMITS	REGISTRATION	78585
AIR NEW SOURCE PERMITS	REGISTRATION	78495
AIR NEW SOURCE PERMITS	REGISTRATION	78603
AIR NEW SOURCE PERMITS	REGISTRATION	78568
AIR NEW SOURCE PERMITS	REGISTRATION	78517
AIR NEW SOURCE PERMITS	REGISTRATION	78576
AIR NEW SOURCE PERMITS	REGISTRATION	78734
AIR NEW SOURCE PERMITS	PERMIT	78809
AIR NEW SOURCE PERMITS	REGISTRATION	78487
AIR NEW SOURCE PERMITS	REGISTRATION	79302
AIR NEW SOURCE PERMITS	REGISTRATION	79084
AIR NEW SOURCE PERMITS	REGISTRATION	78938
AIR NEW SOURCE PERMITS	REGISTRATION	78953
AIR NEW SOURCE PERMITS	REGISTRATION	78880
AIR NEW SOURCE PERMITS	REGISTRATION	79374
AIR NEW SOURCE PERMITS	REGISTRATION	79775
AIR NEW SOURCE PERMITS	REGISTRATION	79875
AIR NEW SOURCE PERMITS	REGISTRATION	79788
AIR NEW SOURCE PERMITS	REGISTRATION	79837
AIR NEW SOURCE PERMITS	REGISTRATION	80164
AIR NEW SOURCE PERMITS	REGISTRATION	79942
AIR NEW SOURCE PERMITS	REGISTRATION	80317
AIR NEW SOURCE PERMITS	REGISTRATION	80208
AIR NEW SOURCE PERMITS	REGISTRATION	80081
AIR NEW SOURCE PERMITS	REGISTRATION	80396
AIR NEW SOURCE PERMITS	REGISTRATION	80748
AIR NEW SOURCE PERMITS	REGISTRATION	80977
AIR NEW SOURCE PERMITS	REGISTRATION	81525
AIR NEW SOURCE PERMITS	REGISTRATION	80984
AIR NEW SOURCE PERMITS	REGISTRATION	81824
AIR NEW SOURCE PERMITS	REGISTRATION	81894
AIR NEW SOURCE PERMITS	REGISTRATION	82080
AIR NEW SOURCE PERMITS	REGISTRATION	82127
AIR NEW SOURCE PERMITS	REGISTRATION	83225
AIR NEW SOURCE PERMITS	REGISTRATION	91821
AIR NEW SOURCE PERMITS	REGISTRATION	82646
AIR NEW SOURCE PERMITS	REGISTRATION	94231
AIR NEW SOURCE PERMITS	REGISTRATION	94364
AIR NEW SOURCE PERMITS	REGISTRATION	94308
AIR NEW SOURCE PERMITS	REGISTRATION	88035
AIR NEW SOURCE PERMITS	REGISTRATION	86436
AIR NEW SOURCE PERMITS	REGISTRATION	87404
AIR NEW SOURCE PERMITS	REGISTRATION	87380
AIR NEW SOURCE PERMITS	REGISTRATION	90729
AIR NEW SOURCE PERMITS	REGISTRATION	85566
AIR NEW SOURCE PERMITS	REGISTRATION	87673
AIR NEW SOURCE PERMITS	REGISTRATION	86987
AIR NEW SOURCE PERMITS	REGISTRATION	91439
AIR NEW SOURCE PERMITS	REGISTRATION	84613
AIR NEW SOURCE PERMITS	REGISTRATION	88584
AIR NEW SOURCE PERMITS	REGISTRATION	87798
AIR NEW SOURCE PERMITS	REGISTRATION	87313
AIR NEW SOURCE PERMITS	REGISTRATION	89769
AIR NEW SOURCE PERMITS	REGISTRATION	87898
AIR NEW SOURCE PERMITS	REGISTRATION	87433
AIR NEW SOURCE PERMITS	REGISTRATION	86394
AIR NEW SOURCE PERMITS	REGISTRATION	95974
AIR NEW SOURCE PERMITS	REGISTRATION	96754

AIR NEW SOURCE PERMITS	REGISTRATION	95513
AIR NEW SOURCE PERMITS	REGISTRATION	83679
AIR NEW SOURCE PERMITS	REGISTRATION	83944
AIR NEW SOURCE PERMITS	REGISTRATION	84050
AIR NEW SOURCE PERMITS	REGISTRATION	84095
AIR NEW SOURCE PERMITS	REGISTRATION	82527
AIR NEW SOURCE PERMITS	REGISTRATION	82471
AIR NEW SOURCE PERMITS	REGISTRATION	84447
AIR NEW SOURCE PERMITS	REGISTRATION	82833
AIR NEW SOURCE PERMITS	PERMIT	84724
AIR NEW SOURCE PERMITS	REGISTRATION	84072
AIR NEW SOURCE PERMITS	REGISTRATION	83038
AIR NEW SOURCE PERMITS	REGISTRATION	87975
AIR NEW SOURCE PERMITS	REGISTRATION	82806
AIR NEW SOURCE PERMITS	REGISTRATION	83076
AIR NEW SOURCE PERMITS	REGISTRATION	85756
AIR NEW SOURCE PERMITS	REGISTRATION	84429
AIR NEW SOURCE PERMITS	REGISTRATION	96763
AIR NEW SOURCE PERMITS	REGISTRATION	96972
AIR NEW SOURCE PERMITS	REGISTRATION	97129
AIR NEW SOURCE PERMITS	REGISTRATION	90312
AIR NEW SOURCE PERMITS	REGISTRATION	87897
AIR NEW SOURCE PERMITS	REGISTRATION	92676
AIR NEW SOURCE PERMITS	REGISTRATION	91442
AIR NEW SOURCE PERMITS	REGISTRATION	85017
AIR NEW SOURCE PERMITS	REGISTRATION	91705
AIR NEW SOURCE PERMITS	REGISTRATION	92561
AIR NEW SOURCE PERMITS	REGISTRATION	87018
AIR NEW SOURCE PERMITS	REGISTRATION	87060
AIR NEW SOURCE PERMITS	REGISTRATION	91851
AIR NEW SOURCE PERMITS	REGISTRATION	85136
AIR NEW SOURCE PERMITS	REGISTRATION	91668
WASTEWATER	PERMIT	WQ0000471000
WASTEWATER	EPA ID	TX0000949
WASTEWATER LICENSING	LICENSE	WQ0000471000
PUBLIC WATER SYSTEM/SUPPLY	REGISTRATION	1020092
IHW CORRECTIVE ACTION	SOLID WASTE REGISTRATION # (SWR)	30137
USED OIL	REGISTRATION	A85413
POLLUTION PREVENTION PLANNING	ID NUMBER	P00684
AIR EMISSIONS INVENTORY	ACCOUNT NUMBER	HH0042M

Location: 300 KODAK BLVD, LONGVIEW, TX, 75602

TCEQ Region: REGION 05 - TYLER

Date Compliance History Prepared: August 31, 2011

Agency Decision Requiring Compliance History: Enforcement

Compliance Period: September 01, 2006 to August 31, 2011

TCEQ Staff Member to Contact for Additional Information Regarding this Compliance History

Name: Miriam Hall Phone: (512) 239-1044

Site Compliance History Components

1. Has the site been in existence and/or operation for the full five year compliance period? Yes

2. Has there been a (known) change in ownership/operator of the site during the compliance period? Yes

3. If Yes, who is the current owner/operator?

OWNOPR	AES Deepwater, Inc.
OWNOPR	Eastman Chemical Company
OWNOPR	Eastman Chemical Company
OWNOPR	Eastman APO, Inc.
OPR	Eastman Gas Company LLC
OWNOPR	Westlake Longview Corporation

4. If Yes, who was/were the prior owner(s)/operator(s)?

OWNOPR	Eastman Cogeneration L.P.
OWNOPR	Westlake Longview Corporation
OWN	Eastman Ethylene Polymers Company

5. When did the change(s) in owner or operator occur?

12/01/2006	OWN	Eastman Ethylene Polymers Company
01/31/2007	OWNOPR	Westlake Longview Corporation
06/04/2009	OWNOPR	Eastman Cogeneration L.P.

6. Rating Date: 9/1/2010 Repeat Violator: NO

Components (Multimedia) for the Site :

A. Final Enforcement Orders, court judgments, and consent decrees of the State of Texas and the federal government.

Effective Date: 06/29/2007 ADMINORDER 2006-1532-AIR-E

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: 20567 SC 6E PA
O-01978 STC 6A OP

Description: Failure to equip 4 open-ended lines and valves with a cap, blind flange, plug, or second valve.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.110(a)(1)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter A 382.0518(a)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: O-01978 Gen Term OP

Description: Failure to obtain authorization for emission sources and their associated emissions prior to operation.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: 18104 SC 10 PA
O-01978 STC 6A OP

Description: Failure to maintain a minimum water supply pressure of 15 psig for water supplied to the Beringer Jet Cleaning Oven.

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)(3)(ii)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT DDD 60.562-1(a)(1)(i)(C)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT Kb 60.112b(a)(3)(ii)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: 20567 SC 3 PA
O-01978 STC 1A OP
O-01978 STC 6A OP

Description: Failure to maintain a net heating value of 200 Btu/scf or greater for the gases being combusted in the Amorphous Polymer Production Facility flare.

Effective Date: 08/10/2007 ADMINORDER 2006-1923-AIR-E

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(1)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: O-01979 STC 2F OP

Description: Failure to report Incident # 79089 within 24 hours of the discovery of the reportable emissions event.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: 1979/STC 10 OP

908 Special Provision 1 PERMIT

Description: Failure to prevent unauthorized emissions during an emissions event (Incidents # 79089).

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(2)(F)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: O-01973 STC 2F OP

Description: Failure to include all reportable pollutants on the initial notification for Incident # 79488.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: 1973/ STC 10 OP
8539/Special Condition 1 PERMIT

Description: Failure to prevent unauthorized emissions during an emissions event (Incidents # 79488).

Effective Date: 09/21/2007 ADMINORDER 2007-0013-AIR-E

Classification: Minor

Citation: 30 TAC Chapter 113, SubChapter C 113.130
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: 52985 SC 10E PERMIT
O-01974 STC 1A OP
O-01974 STC 6 OP

Description: Failure to equip ten open-ended lines with a cap, blind flange, plug, or second valve. And Failure to equip two open-ended lines with a cap, blind flange, plug, or second valve.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: 52985 SC 1 PA
O-01974 STC 6 OP

Description: Failure to meet the maximum allowable emission rate during an emission test on vent EPN 038E103.

Classification: Moderate

Citation: 30 TAC Chapter 113, SubChapter C 113.110
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT F 63.104(b)(4)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: O-01974 STC 1A OP

Description: Failure to sample at the entrance and exit of each heat exchange system to detect leaks on a quarterly basis.

Classification: Minor

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
30 TAC Chapter 122, SubChapter B 122.145(2)(A)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: O-01974 GTC OP

Description: Failure to report all instances of deviations on three submitted Deviation Reports.

Effective Date: 01/12/2008 ADMINORDER 2007-0699-AIR-E

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(G)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: 18104 SC 1 PA
O-01978 STC 6A OP

Description: Failure to meet the maximum allowable emission rate for the vacuum system condenser outlet (EPN 025E108).

Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: 20567 SC 6E PA
O-01978 STC 6A OP

Description: Failure to equip 2 open-ended lines and valves with a cap, blind flange, plug, or second valve.

Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: O-01978 STC 3A(iv)(1) OP

Description: Failure to perform quarterly visible emissions observations on a natural gas-fired heater (EPN 028H1) from November 1, 2004 through June 30, 2006 (seven observations).

Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
30 TAC Chapter 122, SubChapter B 122.145(2)(A)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: O-01978 Gen Cond OP

Description: Failure to report each instance of a deviation in the six month deviation reporting period for the period that the deviation occurred.

Effective Date: 04/03/2008 ADMINORDER 2005-0168-AIR-E

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(1)(A)
30 TAC Chapter 101, SubChapter F 101.201(a)(1)(B)
5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to submit an initial notification within 24 hours of the discovery of an emissions event (Incident No. 47737).

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter F 101.201(c)
5C THC Chapter 382, SubChapter A 382.085(b)

Description: Failed to submit, within two weeks after the end of the emissions event, a final record of an emissions event (Incident No. 47737).

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter A 382.085(b)

Rqmt Prov: Special Condition 1 OP

Description: Failed to prevent unauthorized emissions (Incident No. 47737). Since these emissions were reported late and the cause of the emissions event was avoidable (Incident No. 47737), Eastman failed to meet the demonstrations for an affirmative defense in 30 Tex. Admin. Code § 101.222(b).

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: 1105 PERMIT
FOP O-01436 OP

Description: Failed to prevent an unauthorized emission event on March 29, 2005 (Incident No. 55924). A relief valve, which is not authorized for any emissions, was reported to have released approximately 602 lbs of Volatile Organic Compounds. The emissions do not meet the demonstrations for an affirmative defense in 30 Tex. Admin. Code § 101.222(b).

Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(1)(B)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: FOP O-01974 OP

Description: Failed to meet the minimum reporting requirements for an emission event which began on July 21, 2005. The emission event (Incident No. 61818) was not reported within 24 hours of discovery.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: 1329 SC 1 PA
FOP O-01974 OP

Description: Failed to prevent an unauthorized emission event on July 21, 2005 (Incident No. 61818). The EPN 104T161 was reported to have released approximately 50.60 lbs of Ethylene oxide during the 48-hour event with a permitted limit of 0.34 lbs per hour. The emissions do not meet the demonstrations for an affirmative defense in 30 Tex. Admin. Code § 101.222(b).

Effective Date: 06/05/2008 ADMINORDER 2007-0830-AIR-E

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: 21832 SC 1 PA
O-01436 STC 10A OP

Description: Failed to maintain an emission rate below the hourly allowable emission limit. On September 7, 2006, 1.52 pounds per hour ("lbs/hr") over the permitted limit were released from EPN 098LT90 when tow trucks were loaded for one hour.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: 1105 SC 14B PA
O-01436 STC 10A OP

Description: Failure to depressurize a railcar to the flare. On June 3, 2006, 42 lbs of butyraldehyde was released with an allowable of zero at loading rack SD010LR1 when the railcar depressurized to the atmosphere instead of the flare.

Classification: Moderate

Citation: 30 TAC Chapter 113, SubChapter C 113.100(1)
30 TAC Chapter 113, SubChapter C 113.110
30 TAC Chapter 113, SubChapter C 113.120
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT J 60.102(a)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.126(b)(2)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: 1105 SC 14B PA
O-01436 STC 10A OP

Description: Failure to depressurize a railcar to the flare. On October 17, 2006, 178 lbs of propionaldehyde was released with an allowable of zero at loading rack SD004LR1 when the railcar depressurized to the atmosphere instead of the flare.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: 1967 GC 1A OP
19959, SC 1 OP

Description: Failure to prevent unauthorized emissions. 19.5 lbs of 1-hexene, 0.5 lbs of ethylene, 5.8 lbs of hexanes, 4.4 lbs of octanes, 0.3 lbs of butane, and 4.5 lbs of methyl pentane were released from the final degasser in the Polyethylene No. 3 plant due to incorrect calibration procedures on August 18, 2006.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: O-01969 GC OP
SC1 PERMIT

Description: Failure to prevent unauthorized emissions while unloading solvent (mineral spirits) from the truck. On June 8, 2006, a truck operator disconnected the unloading hose before the tank fill valve was closed which resulted in the release of approximately 30 lbs of a solvent.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: 8522 SC 5 PA
O-01969 STC 4 OP

Description: Failure to meet the maximum allowable emission rate while venting the polymerization reactor to the Polyethylene No. 2 plant flare (EPN 145FL1). The reactor was contaminated due to failure of the operator to properly decant all the water from the catalyst releasing 3.7 lbs of Nitrogen Oxide ("NO"), 0.2 lbs of Nitrogen Dioxide ("NO2"), 28.1 lbs of Carbon Monoxide ("CO"), and 40 lbs of ethylene during 15 minutes of venting the flare on June 18, 2006.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: O-01968 GC OP
SC1 PERMIT

Description: Failed to prevent unauthorized emissions of 12.9 lbs of Neopentyl Glycol, 2.8 lbs of Isobutanol, 0.4 lbs of 2,2,4 Trimethyl 1,3 Pentanediol and 0.9 lbs of Ester while overfilling a process tank on September 27, 2006. The tank level transmitter was incorrectly spanned in a low reading which resulted in a spill due to overfill.

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: 1329 SC 1 PA
49363 SC 1 PA
O-01974 STC 6 OP

Description: Failure to maintain an emission rate below the hourly allowable emission limit. A total of 0.75 lbs/hr and 0.72 lbs/hr of Volatile Organic Compounds ("VOCs") were released from EPNs 036GA1 and 037GA1 respectively, from July 1, 2004 through March 6, 2007.

Effective Date: 06/19/2008 ADMINORDER 2007-1787-AIR-E

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
5C THC Chapter 382, SubChapter D 382.085(b)

Rqmt Prov: 1105 SC 1 PA
1105 SC 14C PA
O-01436 STC 8 OP

Description: Failure to meet the maximum allowable emission rate for VOCs (butyraldehyde) when an operator failed to conduct loading properly on August 18, 2007. Eastman reported (Incident # 96138) that an operator failed to recognize that an ear on a camlock fitting had come loose and further manipulation caused the fitting to completely come loose causing the spill and subsequent air release of 3,256.5 lbs of butyraldehyde [failed to meet the affirmative defense under 101.222(b)(2)-(3)].

Effective Date: 07/21/2008 ADMINORDER 2007-2040-AIR-E

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)(F)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: 8539 SC 1 PA
O-01973 STC 10 OP

Description: Failure to meet the maximum allowable emission rate for 1,3-Butadiene when an emissions event was not reported within the required 24 hour time period. Eastman released 218.9 lbs of 1,3-Butadiene with a VOC allowable of 17.00 lb/hr. Eastman reported (Incident # 97228) an emissions event when the estimated shutdown emissions were exceeded, but did not report the event within 24 hours as required under 30 TAC 101.201 [failed to meet the affirmative defense under 101.222(b)(1)].

Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(1)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: O-01973 STC 2F OP
O-01973 STC 2I OP

Description: Failure to submit a reportable emissions event within 24 hours of the discovery of the event. Eastman submitted the notification for Incident # 97228 on September 10, 2007, but should have reported the event on September 9, 2007 (event started on September 8, 2007.

Effective Date: 03/12/2009 ADMINORDER 2008-1120-AIR-E

Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)(2)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: 18528 SC 1 PA
O-01968 STC 5A OP

Description: Failed to meet the volatile organic compound ("VOC") annual maximum allowable emissions rate of 0.05 tons per year ("TPY") for a storage tank in neopentyl glycol and water service, emission point number ("EPN") 050T197.

Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
30 TAC Chapter 122, SubChapter B 122.145(2)(A)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: O-01968 Gen Cond OP

Description: Failed to report all instances of deviation

Effective Date: 01/28/2010 ADMINORDER 2008-1449-AIR-E

Classification: Moderate

Citation: 30 TAC Chapter 113, SubChapter C 113.130
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(b)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(a)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: SC 2F PA
STC 1A OP
STC 6A OP

Description: Failure to monitor 265 components at the Solvent Plant and by failure to monitor 8 relief valves in the Texanol Plant.

Classification: Moderate

Citation: 30 TAC Chapter 106, SubChapter S 106.433(5)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: O-01976 STC 9A OP

Description: Failure to maintain the opacity limit below 5% while performing surface coating operations in the Building 83 area.

Effective Date: 05/22/2011 ADMINORDER 2010-1834-AIR-E

Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

Rqmt Prov: GTC OP

Description: Failure to prevent unauthorized emissions during an emissions event (Incident # 144227) that occurred on August 31, 2010 at 05:26 hours. The final notification states that the cause of the emissions event was due to the misalignment of the product flow valves associated with a storage tank. The misalignment caused the storage tank to overfill. Further clarification provided by Eastman stated that an operator inadvertently misaligned two manual valves, opening one and closing the other.

B. Any criminal convictions of the state of Texas and the federal government.

N/A

C. Chronic excessive emissions events.

N/A

D. The approval dates of investigations. (CCEDS Inv. Track. No.)

1 09/22/2006 (513659)
2 10/18/2006 (513967)
3 10/19/2006 (514010)
4 10/19/2006 (514234)
5 10/18/2006 (514945)
6 10/18/2006 (515002)
7 10/18/2006 (515038)
8 10/18/2006 (515798)
9 10/18/2006 (515827)
10 10/18/2006 (515875)
11 10/18/2006 (515895)
12 10/18/2006 (515910)
13 10/27/2006 (516004)
14 11/01/2006 (517231)
15 11/01/2006 (517290)

16	11/01/2006	(517576)
17	11/28/2006	(519470)
18	12/19/2006	(531486)
19	11/30/2006	(532795)
20	12/22/2006	(534037)
21	12/20/2006	(534532)
22	12/19/2006	(534736)
23	12/22/2006	(534753)
24	12/22/2006	(534763)
25	12/22/2006	(534773)
26	12/22/2006	(534829)
27	12/22/2006	(534844)
28	12/22/2006	(534851)
29	02/27/2007	(534864)
30	02/05/2007	(535399)
31	02/05/2007	(535402)
32	02/23/2007	(540712)
33	02/28/2007	(542397)
34	02/28/2007	(542403)
35	03/06/2007	(542518)
36	03/06/2007	(542607)
37	03/06/2007	(542633)
38	03/09/2007	(542701)
39	03/06/2007	(543030)
40	03/06/2007	(543040)
41	03/06/2007	(543090)
42	03/06/2007	(543103)
43	03/07/2007	(543118)
44	03/07/2007	(543169)
45	03/07/2007	(543184)
46	03/07/2007	(543198)
47	03/09/2007	(543237)
48	03/09/2007	(543239)
49	03/09/2007	(543240)
50	03/09/2007	(543241)
51	05/15/2007	(555974)
52	04/13/2007	(556590)
53	05/10/2007	(558399)
54	05/08/2007	(558647)
55	06/08/2007	(558951)
56	05/11/2007	(559234)
57	05/23/2007	(561239)
58	08/23/2007	(561251)
59	06/05/2007	(561418)
60	06/05/2007	(561685)
61	06/07/2007	(561883)
62	07/27/2007	(564671)
63	07/16/2007	(567515)

64	08/03/2007	(568920)
65	08/21/2007	(572625)
66	08/29/2007	(573397)
67	08/29/2007	(574037)
68	10/04/2007	(574082)
69	08/30/2007	(574204)
70	08/30/2007	(574222)
71	08/30/2007	(574223)
72	08/31/2007	(574224)
73	08/31/2007	(574225)
74	10/04/2007	(593670)
75	10/04/2007	(596112)
76	10/01/2007	(596124)
77	10/01/2007	(596138)
78	10/04/2007	(596195)
79	10/01/2007	(596392)
80	10/12/2007	(597242)
81	11/05/2007	(599611)
82	11/29/2007	(609674)
83	11/29/2007	(610064)
84	11/29/2007	(610090)
85	11/29/2007	(610184)
86	11/29/2007	(610267)
87	11/29/2007	(610332)
88	11/29/2007	(610334)
89	12/04/2007	(610420)
90	12/14/2007	(611079)
91	12/14/2007	(611581)
92	12/18/2007	(611831)
93	12/18/2007	(611883)
94	12/18/2007	(612106)
95	01/04/2008	(612246)
96	01/09/2008	(614019)
97	01/09/2008	(614046)
98	01/10/2008	(614151)
99	01/10/2008	(614156)
100	01/11/2008	(614208)
101	01/22/2008	(614976)
102	01/24/2008	(615428)
103	02/08/2008	(615569)
104	02/08/2008	(615738)
105	02/14/2008	(617316)
106	03/10/2008	(618228)
107	02/15/2008	(618390)
108	03/03/2008	(619152)
109	03/10/2008	(636470)
110	03/03/2008	(636887)
111	03/13/2008	(637768)

112	03/28/2008	(637868)
113	03/10/2008	(637910)
114	03/27/2008	(639912)
115	03/27/2008	(640046)
116	05/20/2008	(640986)
117	04/09/2008	(641330)
118	05/15/2008	(671074)
119	05/30/2008	(671243)
120	06/27/2008	(682282)
121	06/27/2008	(684493)
122	07/08/2008	(685570)
123	08/18/2008	(688780)
124	08/21/2008	(700208)
125	08/21/2008	(700399)
126	08/26/2008	(700534)
127	08/28/2008	(700769)
128	08/29/2008	(700941)
129	08/29/2008	(701062)
130	08/29/2008	(701128)
131	10/08/2008	(704593)
132	10/22/2008	(705446)
133	10/22/2008	(705493)
134	10/22/2008	(705652)
135	10/22/2008	(705706)
136	10/23/2008	(705765)
137	11/18/2008	(706336)
138	11/04/2008	(706604)
139	11/04/2008	(706629)
140	11/04/2008	(706641)
141	11/04/2008	(706651)
142	11/04/2008	(706702)
143	11/05/2008	(706803)
144	12/01/2008	(708477)
145	12/01/2008	(709302)
146	12/01/2008	(709303)
147	12/30/2008	(709321)
148	12/18/2008	(709518)
149	01/06/2009	(721408)
150	01/06/2009	(721417)
151	02/11/2009	(725159)
152	02/10/2009	(725769)
153	04/02/2009	(738996)
154	05/08/2009	(739191)
155	05/08/2009	(739243)
156	04/28/2009	(743775)
157	05/15/2009	(744381)
158	05/15/2009	(745359)
159	08/21/2009	(745360)

160	09/17/2009	(745361)
161	06/16/2009	(748270)
162	06/16/2009	(748318)
163	08/10/2009	(760206)
164	05/17/2010	(761178)
165	09/01/2009	(762638)
166	08/18/2009	(765125)
167	09/28/2009	(776273)
168	10/06/2009	(776873)
169	10/06/2009	(777577)
170	10/13/2009	(778484)
171	10/13/2009	(778557)
172	11/24/2009	(778616)
173	10/12/2009	(778617)
174	11/24/2009	(780799)
175	01/06/2010	(785689)
176	01/11/2010	(787034)
177	01/11/2010	(787164)
178	01/20/2010	(787254)
179	01/20/2010	(787320)
180	01/12/2010	(787365)
181	03/11/2010	(787977)
182	01/20/2010	(788412)
183	02/01/2010	(789104)
184	03/09/2010	(794113)
185	03/09/2010	(794224)
186	03/11/2010	(794307)
187	03/16/2010	(794308)
188	03/19/2010	(794309)
189	03/15/2010	(795098)
190	04/01/2010	(796513)
191	04/01/2010	(796574)
192	05/11/2010	(800653)
193	05/26/2010	(803567)
194	06/09/2010	(803618)
195	05/26/2010	(803619)
196	05/28/2010	(803651)
197	05/26/2010	(824524)
198	05/28/2010	(824537)
199	06/10/2010	(824558)
200	06/18/2010	(824992)
201	06/14/2010	(826970)
202	06/22/2010	(827069)
203	07/02/2010	(828272)
204	07/21/2010	(828281)
205	07/21/2010	(828282)
206	06/30/2010	(829225)
207	08/18/2011	(829485)

208	07/21/2010	(841323)
209	07/22/2010	(841505)
210	07/29/2010	(841673)
211	07/29/2010	(841675)
212	07/21/2010	(842370)
213	08/24/2010	(849468)
214	10/14/2010	(866063)
215	10/01/2010	(866203)
216	10/28/2010	(866673)
217	10/26/2010	(870211)
218	10/26/2010	(870315)
219	10/27/2010	(870477)
220	10/27/2010	(870637)
221	11/04/2010	(870754)
222	10/15/2010	(870856)
223	10/28/2010	(872171)
224	11/01/2010	(872379)
225	11/17/2010	(872401)
226	11/08/2010	(872479)
227	11/17/2010	(872504)
228	11/17/2010	(872556)
229	11/17/2010	(872557)
230	11/17/2010	(872558)
231	11/17/2010	(873142)
232	11/17/2010	(873492)
233	11/17/2010	(873507)
234	11/17/2010	(873514)
235	12/08/2010	(873528)
236	12/03/2010	(873554)
237	12/13/2010	(880988)
238	12/13/2010	(881266)
239	01/06/2011	(886130)
240	01/11/2011	(886184)
241	01/11/2011	(886185)
242	01/11/2011	(886186)
243	01/03/2011	(886962)
244	01/31/2011	(893417)
245	04/19/2011	(893872)
246	02/23/2011	(899343)
247	02/25/2011	(899354)
248	03/09/2011	(900737)
249	03/10/2011	(901018)
250	04/08/2011	(912109)
251	05/11/2011	(914198)
252	05/12/2011	(914858)
253	05/16/2011	(914970)
254	05/17/2011	(915195)
255	05/09/2011	(915572)

256 05/09/2011 (915609)
257 06/23/2011 (934120)
258 06/27/2011 (934121)
259 08/10/2011 (934122)
260 07/06/2011 (934617)
261 07/06/2011 (934642)
262 07/01/2011 (936416)
263 08/04/2011 (937020)
264 08/09/2011 (941949)
265 07/26/2011 (943212)
266 08/01/2011 (943241)
267 08/11/2011 (943243)
268 08/01/2011 (943244)
269 07/28/2011 (943346)
270 07/28/2011 (943347)
271 08/01/2011 (943348)
272 08/01/2011 (943508)
273 08/01/2011 (943535)
274 08/01/2011 (943568)
275 08/01/2011 (943764)
276 08/22/2011 (944299)
277 08/22/2011 (944300)
278 08/26/2011 (948574)

E. Written notices of violations (NOV). (CCEDS Inv. Track. No.)

Date: 09/28/2006 (514010) CN601214406
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.242-6(a)
48655 SC 4E PA
O-01972 STC 1A OP
O-01972 STC 8A OP
Description: Failure to equip 2 open-ended lines and valves with a cap, blind flange, plug, or second valve.
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
49655 SC 4I PA
O-01972 STC 8A OP
Description: Failure to repair two leaking components within 15 days of discovering the leaks.
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.242-8(c)
48655 SC 4I PA
O-01972 STC 1A OP
O-01972 STC 8A OP
Description: Failure to repair a leaking connector within 15 days of discovering the leaking connector.

Date: 09/29/2006 (514234) CN601214406
Self Report? NO Classification: Moderate
Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.242-6(a)

O-01973 STC 1A OP

Description: Failure to equip 7 open-ended lines and valves with a cap, blind flange, plug, or second valve.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 113, SubChapter C 113.560
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1033(b)(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT YY 63.1103(e)(3)
O-01973 STC 1F OP

Description: Failure to equip 113 open-ended lines and valves with a cap, blind flange, plug, or second valve.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 113, SubChapter C 113.560
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT SS 63.982(b)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT SS 63.999(a)(1)(iv)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT YY 63.1103(e)(3)
O-01973 STC 1F OP

Description: Failure to submit prior flare test reports 90 days prior to the compliance date of January 6, 2006.

Date: 11/01/2006 (517576) CN601214406

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 113, SubChapter C 113.130
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)
48626 SC 10E PA
O-01971 OP

Description: Failure to equip one open-ended line with a blind flange.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
48626 SC 10E PA
O-01971 STC 8 OP

Description: Failure to equip one open-ended line with a blind flange.

Self Report? NO Classification: Moderate

Citation: 19230 SC 2E PA
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
O-01971 STC 8 OP

Description: Failure to equip four open-ended line with a cap, blind flange, or plug.

Date: 12/15/2006 (531486) CN601214406

Self Report? NO Classification: Moderate

Citation: 21832 SC 12E PA
27941 SC 6E PA
30 TAC Chapter 101, SubChapter A 101.20(1)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-6(a)(1)
O-01977 STC 1A OP
O-01977 STC 9A OP

Description: Failure to equip 9 open-ended lines and valves with a cap, blind flange, plug, or second valve.

Date: 12/22/2006 (534037) CN601214406

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 113, SubChapter C 113.110
30 TAC Chapter 113, SubChapter C 113.130
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT F 63.100(b)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)
O-01982 STC 1A OP

Description: Failure to equip 2 double valves with a cap, blind flange, plug, or second valve.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 113, SubChapter C 113.110
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT F 63.100(b)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT F 63.104(b)(4)
O-01982 STC 1A OP

Description: Failure to sample at the entrance and exit of each heat exchange system to detect leaks on a quarterly basis.

Self Report? NO Classification: Moderate

Citation: 1105 SC 8 PA
30 TAC Chapter 113, SubChapter C 113.100
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)(3)(ii)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.11(b)(6)(ii)
O-01982 STC 1A OP
O-01982 STC 7A OP

Description: Failure to maintain a net heating value of 200 Btu/scf or greater for the gases being combusted in the flare operated by Oxo Aldehydes (OX027FL1).

Date: 02/23/2007 (540712)

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.242-6(a)
O-01821 STC 1A OP

Description: Failure to equip 2 open-ended lines, valves, or flanges with a cap, blind flange, plug, or second valve.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 113, SubChapter C 113.620
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT EEE 63.1209(j)(3)(iii)
O-01981 STC 1A OP

Description: Failure to maintain the hazardous waste feed rate to the RKI (5390 lb/hr limit) and SCC (1895 lb/hr limit) below the required limit (hourly rolling average).

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter F 116.615(2)
30 TAC Chapter 122, SubChapter B 122.143(4)
43891 Rep PA
O-01981 STC 12A OP

Description: Failure to maintain the CO concentration below the 350 ppm limit (15 minute average).

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 113, SubChapter C 113.620
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT EEE 63.1203(a)(5)(i)
O-01981 STC 1A OP

Description: Failure to maintain the CO concentration below the 100 ppm HRA.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.356(f)(1)
O-01981 STC 1A OP

Description: Failure to maintain a signed and dated certification documenting the performance level of the closed-vent system and control device.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.343(a)(1)(i)(A)
O-01981 STC 1A OP

Description: Failure to conduct annual monitoring on openings on six tanks (TK-27, TK-28, TK-29, TK-2A, TK-3A, and TK-4A) subject to 40 CFR 61, Subpart FF.

Date: 03/09/2007 (542701) CN601214406

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 113, SubChapter C 113.560
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1033(b)(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT YY 63.1103(e)(3)
O-01979 STC 1D OP

Description: Failure to equip 14 open-ended lines, valves, or flanges with a cap, blind flange, plug, or second valve.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 113, SubChapter C 113.560
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1024(a)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT YY 63.1103(e)(3)
O-01979 STC 1D OP

Description: Failure to re-monitor a leaking valve within 15 days of discovering the leak after the valve had been repaired within the 15 days.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
48590 SC 11I PA
O-01979 STC 10A OP

Description: Failure to repair a valve during a shutdown that had been placed on delay of repair.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 113, SubChapter C 113.560
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT SS 63.999(a)(1)(iv)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1034(b)(2)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT YY 63.1103(e)(3)
O-01979 STC 1D OP

Description: Failure to submit prior flare test reports 90 days prior to the compliance date of January 8, 2006.

Date: 05/03/2007 (558647) CN601214406

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
7695 SC 10 PA
O-01983 STC 8A OP

Description: Failure to conduct quarterly sampling for VOCs from the pellets on C-Line from November 1, 2005 through December 31, 2005.

Self Report? NO Classification: Moderate

Citation: 18104 SC 6 PA
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
O-01983 STC 8A OP

Description: Failure to perform sampling downstream on one of the vacuum stripping tanks to determine the residual VOC in the molten wax during the fourth quarter of 2006.

Date: 05/15/2007 (555974) CN601214406

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.242-6(a)
48655 SC 4E PA
O-01972 STC 1A OP
O-01972 STC 8A OP

Description: Failure to equip 6 open-ended lines with a cap, blind flange, plug, or second valve.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
O-01972 STC 3 OP

Description: Failure to conduct four visible emissions observations during the second quarter of 2006.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT J 61.112(a)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.242-2(a)
O-01972 STC 1A OP

Description: Failure to perform monthly monitoring on two pumps in benzene service.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.345(a)(1)(ii)

O-01972 STC 7A OP

Description: Failure to maintain a cover on a container containing benzene laden waste.

Date: 07/27/2007 (564671) CN601214406

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 113, SubChapter C 113.520
30 TAC Chapter 113, SubChapter C 113.560
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1033(b)(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT YY 63.1103(b)(1)
5C THC Chapter 382, SubChapter D 382.085(b)
O-01973 STC 1E OP
O-01973 STC 1F OP

Description: Failure to equip 22 open-ended lines and valves with a cap, blind flange, plug, or second valve.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 113, SubChapter C 113.520
30 TAC Chapter 113, SubChapter C 113.560
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1022(c)(4)(ii)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT YY 63.1103(e)(3)
5C THC Chapter 382, SubChapter D 382.085(b)
O-01973 STC 1E OP
O-01973 STC 1F OP

Description: Failure to monitor 422 difficult to monitor (DTM) during 2006.

Date: 07/27/2007 (568606) CN601214406

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 113, SubChapter C 113.110
30 TAC Chapter 113, SubChapter C 113.120
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)(3)(ii)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.11(b)(6)(ii)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT F 63.102(a)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.126(b)(2)(i)
48758 SC 6A PA
5C THC Chapter 382, SubChapter D 382.085(b)
O-01436 STC 10A OP
O-01436 STC 1A OP

Description: Failure to meet the flare (EPN 027FL1) minimum heating value of 200 Btu/scf while venting HAP emissions from emission units SD004LR1 and SD004LT41. Eastman reported that from January 30, 2006 through February 27, 2006 the assist gas control valve was closed which did not supplement the vented gas to achieve a minimum heating value of 200 Btu/scf.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 113, SubChapter C 113.110
30 TAC Chapter 113, SubChapter C 113.130
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT F 63.100(b)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)
49363 SC 8E PA
5C THC Chapter 382, SubChapter D 382.085(b)
O-01436 STC 10A OP
O-01436 STC 1A OP

Description: Failure to equip 2 loading arms with a cap. Eastman reported that on June 21, 2006, 2 loading arm caps were found missing and were replaced.

Self Report? NO Classification: Minor

Citation: 21832 SC 12E PA
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
48591 SC 5E PA
5C THC Chapter 382, SubChapter D 382.085(b)
6777 SC 6E PA
O-01436 STC 10A OP

Description: Failure to equip 3 open-ended lines with a cap, blind flange, plug, or second valve.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
48758 SC 7I PA
5C THC Chapter 382, SubChapter D 382.085(b)
O-01436 STC 10A OP

Description: Failure to repair a leaking component within 15 days of the discovery of the leak. Eastman reported that on June 13, 2006 a leaking valve was discovered but was not repaired until June 29, 2006, 16 days after discovery of the leak.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 113, SubChapter C 113.520
30 TAC Chapter 113, SubChapter C 113.560
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1033(b)(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT YY 63.1103(e)(3)
5C THC Chapter 382, SubChapter D 382.085(b)
O-01463 STC 1E OP

Description: Failure to equip 1 open-ended line, with a cap, blind flange, plug, or second valve. This component only has federal applicability under 40 CFR 63, Subpart YY.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 113, SubChapter C 113.110
30 TAC Chapter 113, SubChapter C 113.130
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT F 63.100(b)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)
5C THC Chapter 382, SubChapter D 382.085(b)
O-01436 STC 1A OP

Description: Failure to equip 1 open-ended line, with a cap, blind flange, plug, or second valve. This component only has federal applicability.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)
O-01436 STC 3A OP

Description: Failure to conduct one visible emissions observations during the first quarter of 2006. Eastman reported that they did not perform the quarterly observation on EPN 010LT61.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
30 TAC Chapter 122, SubChapter B 122.145(2)(A)
5C THC Chapter 382, SubChapter D 382.085(b)
O-01436 GC OP

Description: Failure to report each instance of a deviation in the six month deviation reporting period for the period that the deviation occurred.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT DDD 60.562-2(a)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-6(a)(1)
5C THC Chapter 382, SubChapter D 382.085(b)
O-01967 STC 1A OP

Description: Failure to equip 32 open-ended lines and valves with a cap, blind flange, plug, or second valve.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT DDD 60.563(b)(2)(ii)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT DDD 60.565(e)(1)
5C THC Chapter 382, SubChapter D 382.085(b)
O-01967 STC 1A OP

Description: Failure to maintain a functioning monitoring device that indicates the presence of a flame at each flare pilot light and failure to maintain records that demonstrate that the pilot was lit.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)

5C THC Chapter 382, SubChapter D 382.085(b)
O-1969 STC 4 OP

Description: Failure to maintain the time weighted average vacuum pressure below 105 mm Hg.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-6(a)(1)
48591 SC 5E PA
5C THC Chapter 382, SubChapter D 382.085(b)
O-01968 5A OP
O-01968 STC 1A OP

Description: Failure to equip 10 open-ended lines and valves with a cap, blind flange, plug, or second valve.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT RRR 60.702(b)
5C THC Chapter 382, SubChapter D 382.085(b)
O-01968 STC 1A OP

Description: Failure to vent a 40 CFR 60 Subpart RRR reactor to a flare that was tested and shown to meet 40 CFR 60.18.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT RRR 60.705(l)(8)
5C THC Chapter 382, SubChapter D 382.085(b)
O-01968 STC 1A OP

Description: Failure to notify of a change in concentration within 180 days of the change in concentration.

Date: 08/03/2007 (568922) CN601214406

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 113, SubChapter C 113.130
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(a)
O-01974 STC 1A OP

Description: Failure to monitor 241 connectors in the Solvent Plant 2 that were subject to 40 CFR 63, Subpart H.

Date: 11/05/2007 (599611) CN601214406

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.110(a)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THC Chapter 382, SubChapter D 382.085(b)
O-01970 SC 7 OP

Description: Failure to limit emissions burned in the flare (EPN 030FL1) to emergency use only when the analyzer mechanic left the bleed line open after calibrating the off-gas fuel calorimeter on August 4, 2006. These emissions were vented to the flare. Condition 6 of Standard Exemption No. 96 (Standard Exemption List dated January 8, 1990), limits the flare usage to emergencies only. Eastman reported excess air emissions of less than 1 pound. The unauthorized emissions occurred for 1.5 hours.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT D 60.42(a)(2)
5283 SC 1 PA
5C THC Chapter 382, SubChapter D 382.085(b)
O-01970 STC 1A OP

Description: Failure to meet the maximum opacity limit while conducting a routine overfire test at Boiler 11 (EPN 030B11). Eastman reported that the 20% opacity limit was exceeded (two six minute periods) when the oxygen level was too low for the off-gas sent to the boiler during the test.

Date: 02/14/2008 (617348) CN601214406

Self Report? NO Classification: Minor

Citation: 21832, SC 12E PA
27941, SC 6E PA
30 TAC Chapter 101, SubChapter A 101.20(1)
30 TAC Chapter 113, SubChapter C 113.110
30 TAC Chapter 113, SubChapter C 113.130
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-6(a)(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT F 63.100(b)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)
5C THSC Chapter 382 382.085(b)
9631, SC 1E PA
O-01977, STC 1A OP
O-01977, STC 9A OP

Description: Failure to equip 9 open-ended lines or valves with a cap, blind flange, plug, or second valve.

Self Report? NO Classification: Moderate

Citation: 27941, SC 6K PA
30 TAC Chapter 113, SubChapter C 113.110
30 TAC Chapter 113, SubChapter C 113.130
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT F 63.100(b)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(d)(4)
5C THSC Chapter 382 382.085(b)
O-01977, STC 1A OP
O-01977, STC 9A OP

Description: Failure to monitor 84 valves in (hazardous air pollutant) HAP service during the third quarter of 2006.

Self Report? NO Classification: Moderate

Citation: 21832, SC 10 PA
30 TAC Chapter 101, SubChapter A 101.20(1)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)(3)(ii)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT NNN 60.662(b)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT QQQ 60.702(b)
5C THSC Chapter 382 382.085(b)
O-01977, STC 9A OP

Description: Failure to maintain a net heating value of 200 Btu/scf or greater for the gases being combusted in the MIPK flare.

Date: 02/15/2008 (618390) CN601214406

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 113, SubChapter C 113.130
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)
48626 SC 10E PA
5C THSC Chapter 382 382.085(b)
O-01971 STC 1A OP
O-01971 STC 8 OP

Description: Failure to equip four open-ended lines with a cap, blind flange, plug, or second valve. Eastman reported that on January 30, 2007, one missing plug was found and was replaced; on February 2, 2007, 1 flange was found missing and a second valve was installed; on December 12, 2006, one flange was found missing and a blind flange was installed; also on December 12, 2006, one plug was found missing and was replaced. These components are subject to the HON requirements and NSR permit requirements.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.354(a)(1)
5C THSC Chapter 382 382.085(b)
O-01971 STC 1A OP

Description: Failure to conduct monthly sampling on the waste stream exiting the treatment process (acetaldehyde stripper) to determine benzene concentration. Eastman reported that the sampling should have been conducted during January 2007, but

was not conducted until February 2, 2007. 40 CFR 61.354(a)(1) requires that the waste stream exiting the treatment process be sampled and analyzed monthly for the benzene concentration in the waste stream. 30 TAC 101.20(2) requires compliance with 40 CFR 61.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
48626 SC 1 PA
5C THSC Chapter 382 382.085(b)
O-01971 STC 8 OP

Description: Failure to maintain water flow to the scrubber controlling HCl emissions from the HCl storage tank battery. Eastman reported that from December 3, 2006 at 21:00 hours to December 4, 2006 at 09:00 hours, the water line froze causing the loss of water to the scrubber. Eastman estimated one pound of excess HCl emissions. NSR Permit 48626, SC 1 does not authorize the excess air emissions from the storage tank battery.

Date: 03/03/2008 (636887) CN601214406

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 106, SubChapter S 106.433(5)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
O-01976 ST&C 9A OP

Description: Failure to maintain the opacity limit below 5% while performing surface coating operations. Eastman reported that during the first and second quarter opacity observations, Eastman personnel observed a 5.2% opacity on January 22, 2007 and 7.3% opacity on April 17, 2007 while the contractor was performing spray painting. 30 TAC 106.433(5) limits the opacity to 5%. FOP O-01976, ST & C 9.A. requires that the permit holder meet the requirements of Permits by Rule.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 106, SubChapter T 106.452(2)(A)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
O-01976 ST&C 9A OP

Description: Failure to maintain the abrasive usage rate below the one ton per day limit. Eastman reported that on May 19, 2007, the one ton per day usage rate was exceeded by 40 pounds for a total of 2040 lbs. 30 TAC 106.452(2)(A) limits the abrasive usage rate to one ton per day. FOP O-01976, ST & C 9.A. requires that the permit holder meet the requirements of Permits by Rule. 30 TAC 122.143(4) requires compliance with the conditions of the FOP.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 106, SubChapter W 106.512(1)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
O-01976 ST&C 9A OP

Description: Failure to register a 275 horsepower engine prior to operation. Eastman reported that an engine for an air compressor that supplies air for spray painting has been operating prior to the issuance of the FOP. 30 TAC 106.512(1) requires that an engine rated 240 horsepower or greater be registered within 10 days of commencement of operation. The registration was submitted on June 1, 2007. FOP O-01976, ST & C 9.A. requires that the permit holder meet the requirements of Permits by Rule.

Date: 03/28/2008 (639912) CN601214406

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
O-01978 STC 3A(iv)(1) OP

Description: Failure to perform a quarterly visible emissions observation on a natural gas-fired heater (EPN 028H1) from July 1, 2006 through September 30, 2006 (one observation). FOP O-01978 STC 3A(iv)(1) requires quarterly visible emissions observations. 30 TAC 122.143(4) requires compliance with the conditions of the FOP.

Date: 05/16/2008 (671074) CN601214406

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 113, SubChapter C 113.110
30 TAC Chapter 113, SubChapter C 113.130
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT F 63.100(b)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)
5C THSC Chapter 382 382.085(b)
O-01982 STC 1A OP

Description: Failure to equip 2 open-ended lines with a cap, blind flange, plug, or second valve. These components only have federal applicability. Eastman reported that during the month of April 2007, one plug was found missing and was replaced. Eastman also reported that on December 18, 2006, one plug was found missing and was replaced.

Self Report? NO Classification: Moderate

Citation: 1105 SC 5I PA
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
O-01982 STC 7A OP

Description: Failure to repair a component within 15 days of discovering the leak (this component has state applicability only). Eastman reported that a pressure relief valve was found leaking on 9/27/2006. The component was not repaired until 10/15/2006 (18 days after discovery of the leak).

Date: 05/20/2008 (640986)

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
6777 SC 6F PA
O-01436 STC 10A OP

Description: Failure to conduct quarterly monitoring on a 3 inch valve (Tag # 32162) in the Mixed Esters Unit. During the review of the monitoring data, the investigator determined that the valve was added in February 2007 and was listed as exempt in the database due to size. The exemption only applies to components 2 inches or smaller. Eastman personnel confirmed that the component was actually 3 inches in size and should not have been listed as exempt.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
48761 SC 5C PA
5C THSC Chapter 382 382.085(b)
O-01436 STC 10A OP

Description: Failure to maintain records of maintenance, start-up, and shutdown (SSM) activities related to the Feedstock and Product Distribution Facility. During the investigation, the investigator requested the SSM actvity records and was told by Eastman personnel that the records were no longer kept because they thought the activities were permitted.

Self Report? NO Classification: Minor

Citation: 1105 SC 15 PA
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
48758 SC 3A PA
5C THSC Chapter 382 382.085(b)
6777 SCs 11and 12 PA
O-01436 STC 10A OP

Description: Failure to maintain vapor tightness records for truck and railcars loaded at the facility. During the investigation, the investigator requested the vapor tightness records (test required every 12 months), but was provided pressure test records which are required every five years.

Self Report? NO Classification: Moderate

Citation: 1105 SC 14B PA
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
O-01436 STC10A OP

Description: Failure to maintain the uncontrolled loading rate of solvent B-624 below the 11,000 gallons per hour rate. During the investigation, the investigator determined that Eastman had a measured loading rate of 13,992 gal/hr while loading solvent B-624. During 2005, Eastman loaded 337,804 gallons and in 2006, Eastman loaded 441,333 gallons, uncontrolled.

Self Report? NO Classification: Minor

Citation: 1105 SC 5E PA

30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
O-01436 STC 10A OP

Description: Failure to equip one open-ended line with a cap, blind flange, plug, or second valve. This component only has state applicability. Eastman reported that on October 3, 2007, 1 plug was found missing and was replaced.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
O-01436 STC 3A OP

Description: Failure to conduct one visible emissions observation during the second quarter of 2007. Eastman reported that they did not perform the quarterly observation on EPN 007H5.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
30 TAC Chapter 122, SubChapter B 122.145(2)(A)
5C THSC Chapter 382 382.085(b)
O-01436 GC OP

Description: Failure to report each instance of a deviation in the six month deviation reporting period for the period that the deviation occurred. As stated above in issues 1, 2, 3, 4, and 5, the investigator found violations that were not reported in the deviation periods that they occurred. Deviation reports covering each six month period from November 1, 2004 through October 31, 2007 were submitted, but Eastman did not report these as deviations.

Date: 05/30/2008 (680519) CN601214406

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 113, SubChapter C 113.620
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT EEE 63.1211(b)
5C THSC Chapter 382 382.085(b)
O-01981 STC 1A OP

Description: Failure to record OMAs on the RKI and FBI and pressure data on the RKI on two ocassions while the residence time had not expired. The data was lost due to a security patch installation. Eastman reported that the data was not captured on November 21, 2007 from 09:45 to 10:07 and on December 20, 2006 from 14:06 to 14:22. 40 CFR 63.1211(b) [40 CFR 63, Subpart EEE] requires recordkeeping of the required data.

Date: 06/27/2008 (682282) CN601214406

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-2(a)(1)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(a)
48591 SC 5F PA
48591 SC 5G PA
5C THSC Chapter 382 382.085(b)

Description: Failure to conduct fugitive monitoring on 58 valves and two pumps in the 2 Ethylhexanol Unit. Eastman reported that the components associated with one co-product tank were missed and therefore were not monitored. 40 CFR 60.482-2(a)(1) requires that the pumps be monitored monthly. 40 CFR 60.482-7(a) requires that the valves be monitored monthly until leaks are not detected for two successive months.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-6(a)(1)
48591 SC 5E PA
5C THSC Chapter 382 382.085(b)
O-01968 STC 1A OP
O-01968 STC 5A OP

Description: Failure to equip one open-ended line with a cap, blind flange, plug, or second valve. This component has state and federal applicability. Eastman reported that on February 20, 2008, 1 plug was found missing and was replaced. 40 CFR 60.482-6(a)(1) and NSR permit 48591, SC 5E require that each open-ended line

or valve must be equipped with a cap, blind flange, plug, or second valve.

Date: 08/28/2008 (700769) CN601214406

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 113, SubChapter C 113.520
30 TAC Chapter 113, SubChapter C 113.560
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1033(b)(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT YY 63.1103(e)(3)
5C THSC Chapter 382 382.085(b)
STC 1D OP

Description: Failure to equip 1 open-ended line with a cap, blind flange, plug, or second valve. This component only has federal applicability under 40 CFR 63, Subpart YY. Eastman reported that on July 16, 2007, 1 plug was found missing and was replaced. 40 CFR 63.1103(e)(3) [40 CFR 63, Subpart YY] requires compliance with 40 CFR 63, Subpart UU. 40 CFR 63.1033(b)(1) [40 CFR 63, Subpart UU] requires that each open-ended line or valve must be equipped with a cap, blind flange, plug, or second valve.

Date: 08/29/2008 (701062) CN601214406

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 113, SubChapter C 113.520
30 TAC Chapter 113, SubChapter C 113.560
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1033(b)(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT YY 63.1103(e)(3)
STC 1E OP
STC 1F OP

Description: Failure to equip 8 open-ended lines and valves with a cap, blind flange, plug, or second valve. Eastman reported that on May 15, 2007, 2 plugs were found missing and were replaced, on May 16, 2007, 2 plugs were found missing and were replaced, on July 11, 2007, 1 plug was found missing and was replaced, on September 17, 2007, 1 plug was found missing and was replaced, on September 25, 2007, 1 plug was found missing and was replaced, and on December 6, 2007, 1 plug was found missing and was re

Date: 08/29/2008 (701128) CN601214406

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.345(c)
5C THSC Chapter 382 382.085(b)
STC 6A OP

Description: Failure to make the first repair attempt within 15 days after a leak was found on a benzene waste container. Eastman reported that the leak was found on May 23, 2007, but the first repair attempt was not made until June 8, 2007, 16 days after discovering the leak. 40 CFR 61.345(c) requires that the first attempt at repair be made no later than 15 calendar days after discovering the leak. 30 TAC 101.20(2) requires compliance with 40 CFR 61. FOP O-01972 STC 6A requires compliance with 40 CFR 6

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT V 61.242-2(e)(3)
5C THSC Chapter 382 382.085(b)
STC 1A OP

Description: Failure to perform annual monitoring on two pumps in benzene service (Pumps P37-A and P-37B). Eastman reported that the pumps are designated as "no detectable emissions" pumps, but were marked as exempt from monitoring. The two pumps were monitored by October 1, 2007. 40 CFR 61.242-2(e)(3)] requires that each pump be monitored for no detectable emissions on an annual basis. 30 TAC 101.20(2) requires compliance with 40 CFR 61.

Date: 10/22/2008 (705652) CN601214406

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 113, SubChapter C 113.130
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)
48626, SC 10E PA

5C THSC Chapter 382 382.085(b)
O-01971 STC 1A OP
O-01971 STC 8 OP

Description: Failure to equip one open-ended line with a blind flange. Eastman reported that on April 14, 2008, 1 flange was found missing and a blind flange was installed. This component is subject to the HON requirements and NSR permit requirements.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
48626 SC 10E PA
5C THSC Chapter 382 382.085(b)
O-01971 STC 8 OP

Description: Failure to equip one open-ended line with a plug. Eastman reported that on April 14 2008, 1 plug was found missing and plug was installed. This component is only subject to the NSR permit requirements.

Date: 10/22/2008 (705706) CN601214406

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
O-01970 STC 3A OP

Description: Failure to perform the quarterly visible emissions observations on ten engine sources in the Power and Services Area. Eastman reported that the observation was not performed during the following quarters: 4th quarter of 2004, 1st quarter of 2005, 2nd quarter of 2005, 4th quarter of 2005, and the 1st quarter of 2006. The observations were not performed on the following engines: 067PAC1, 057PP1, 017PE1, 017PE2, 057FP2, 056FP6, 115FP10, 202FP12, and 031EG.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
30 TAC Chapter 122, SubChapter B 122.145(2)(A)
5C THSC Chapter 382 382.085(b)
O-01970 GC OP

Description: Failure to report each instance of a deviation in the six month deviation reporting period for the period that the deviation occurred. Under issue 1, Eastman did not report the missed quarterly visible emissions observations in the deviation period that they occurred. Deviation reports covering each six month period from July 1, 2004 through June 30, 2006 were submitted, but Eastman did not report these as deviations. Eastman also did not report the failure to report these deviations as a dev

Date: 12/18/2008 (709518) CN601214406

Self Report? NO Classification: Minor

Citation: 21832 SC 12E PA
30 TAC Chapter 101, SubChapter A 101.20(1)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-6(a)(1)
5C THSC Chapter 382 382.085(b)
O-01977 STC 10A OP
O-01977 STC 1A OP

Description: Failure to equip 9 open-ended lines or valves with a cap, blind flange, plug, or second valve. Eastman reported that on March 16, 2008, 1 plug was found missing and was replaced; on April 25, 2008, 8 plugs were found missing and were replaced (all components have state and NSPS applicability).

Date: 12/30/2008 (709321) CN601214406

Self Report? NO Classification: Moderate

Citation: 20567 SC 3 PA
30 TAC Chapter 101, SubChapter A 101.20(1)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT A 60.18(c)(3)(ii)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT DDD 60.562-1(a)(1)(i)(C)
5C THSC Chapter 382 382.085(b)
O-01978 STC 1A OP
O-01978 STC 5 OP

Description: Failure to maintain the net heating value of the gas being combusted in the flare (EPN 054FL2) at 200 Btu/scf or greater. Eastman reported that they failed to return the controller to automatic after depressurizing the propylene regeneration

bed to the flare which caused the drop in net heating value. The net heating value dropped (minimum of 45.7 Btu/scf with an average of 60 Btu/scf) from 5/31/2008 at 20:49 hours to 6/1/2008 at 15:56 hours.

Self Report? NO Classification: Moderate

Citation: 20567 SC 6F PA
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
O-01978 SC 5 OP

Description: Failure to conduct quarterly monitoring on 38 valves in VOC service. During the review of the fugitive monitoring data, the investigator documented the failure to monitor.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
O-01978 Gen Cond OP

Description: Failure to report each instance of a deviation in the six month deviation reporting period for the period that the deviation occurred. As stated in Track No. 352375, the investigator found violations that were not reported in the deviation periods that they occurred. Deviation reports covering each six month period from January 1, 2007 through June 30, 2008 were submitted, but Eastman did not report these as deviations.

Date: 05/08/2009 (739243) CN601214406

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
SC 9 PERMIT
STC 10A OP

Description: Failure to meet the 1,000,000 pound limit for loading drums in the Propanol Process Plant. Eastman reported that the limit was exceeded during the period of September 1, 2007 through August 31, 2008 and a PBR was claimed August 25, 2008 to authorize the increased drum loading. The investigator determined that the limit had been exceeded for the period of August 1, 2007 through July 31, 2008.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 113, SubChapter C 113.520
30 TAC Chapter 113, SubChapter C 113.890
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1025(b)(3)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1026(b)(1)
5C THSC Chapter 382 382.085(b)
STC 1A OP

Description: Failure to monitor 25 components (24 valves and 1 pump) in light liquid HAP service on a monthly basis. Eastman reported that an idle storage tank (40T-110) was placed in denatured ethanol service and the LDAR contractor was not notified to perform the monitoring. 40 CFR 63.2480(a) [40 CFR 63, Subpart FFFF] requires compliance with 40 CFR 63 Subaprt UU. 40 CFR 63.1025(b)(3) and 63.1026(b)(1) [40 CFR 63, Subpart UU] require that valves and pumps, respectively, be monitored on a monthly basis.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
30 TAC Chapter 122, SubChapter B 122.145(2)(A)
5C THSC Chapter 382 382.085(b)
General Conditions OP

Description: Failure to report each instance of a deviation in the six month deviation report for the period that the deviation occurred. As stated above in Track No. 364017, the investigator determined that the drum loading limit had been exceeded for the period of August 1, 2007 through July 31, 2008, however, Eastman reported the period as September 1, 2007 through August 31, 2008.

Date: 05/08/2009 (739191) CN601214406

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 113, SubChapter C 113.620
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT EEE 63.1203(a)(5)(i)
5C THSC Chapter 382 382.085(b)

STC 1D OP

Description: Failure to maintain the CO concentration below the 100 ppm HRA. Eastman reported that the 100 ppm HRA was exceeded on two occasions while feeding waste to the RKI. The limit was exceeded on February 9, 2008 (171 ppm average from 15:37 to 16:42, with a maximum HRA of 232 ppm), and on February 16, 2008 (106 ppm average from 16:30 to 17:25, with a maximum of 109 ppm).

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 106, SubChapter A 106.8(c)(2)(A)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
STC 13 OP

Description: Failure to maintain accurate records of the number of cans punctured in the Aerosol Can Puncturing Unit. Eastman reported that on two occasions, the contractor estimated the number of cans punctured in the unit and did not count them. 30 TAC 106.8(c)(2) requires that records be kept to demonstrated compliance.

Date: 05/15/2009 (744381) CN601214406

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
30 TAC Chapter 113, SubChapter C 113.500
30 TAC Chapter 113, SubChapter C 113.520
30 TAC Chapter 113, SubChapter C 113.560
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT QQQ 60.705(d)(2)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT SS 63.998(d)(1)(ii)(B)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1034(b)(2)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT YY 63.1103(e)(3)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT YY 63.1109(b)
5C THSC Chapter 382 382.085(b)
STC 1A OP
STC 1D OP

Description: Failure to maintain records of car seal inspections for a five year retention period. Eastman reported that the records were discarded for the years of 2004, 2005, and 2006. Car seal inspection records were discarded prematurely due to a misunderstanding of records retention for safety and environmental documents.

Date: 05/15/2009 (745359) CN601214406

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 113, SubChapter C 113.130
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)
5C THSC Chapter 382 382.085(b)
STC 1A OP

Description: Failure to equip 2 open-ended lines with a cap, blind flange, plug, or second valve. Eastman reported that on September 26, 2008, one plug was found missing and was replaced, and on January 15, 2009, one flange was found missing and a blind flange was installed. These components only have federal applicability under 40 CFR 63, Subpart H. 40 CFR 63.167(a)(1)requires that each open-ended line or valve must be equipped with a cap, blind flange, plug, or second valve.

Date: 08/10/2009 (760206) CN601214406

Self Report? NO Classification: Minor

Citation: 40 CFR Chapter 270, SubChapter I, PT 270, SubPT C 270.30(a)
50043 PERMIT

Description: Failure to maintain a groundwater well at the hazardous waste landfill. The casing on groundwater well # 659 at the hazardous waste landfill was cracked.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 335, SubChapter C 335.69(a)(1)(A)
30 TAC Chapter 335, SubChapter E 335.112(a)(8)
40 CFR Chapter 262, SubChapter I, PT 262, SubPT C 262.34(a)(1)(i)

Description: Failure to keep container closed except when adding or removing waste.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 335, SubChapter A 335.4
TWC Chapter 26 26.121

Description: Failure to abate an unauthorized discharge of compressor oil from the leachate compressor located at the hazardous waste landfill. Discharge of compressor oil

was observed on the ground around the hazardous waste landfill leachate compressor.

Self Report? NO Classification: Minor

Citation: 40 CFR Chapter 262, SubChapter I, PT 262, SubPT C 262.34(c)(1)(ii)

Description: Failure to properly have a hazardous waste container labeled in Container Storage Area (CSA) #2 and the RKI Bottom Ash Dumpster trough Unit #76.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 335, SubChapter C 335.69(a)(1)(B)
40 CFR Chapter 262, SubChapter I, PT 262, SubPT C 262.34(a)(1)(ii)

Description: Failure to maintain secondary containment free of cracks and gaps at CSA# 2, Permit Unit # 32 and Tank #509.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 335, SubChapter F 335.152(a)(1)
40 CFR Chapter 264, SubChapter I, PT 264, SubPT C 264.15(d)

Description: Failure to record inspections and signatures in an inspection log for the following days 7/8/07, 8/3/07,8/23/07,6/1/07,6/16/08,3/30/07, 6/13/08,6/17/07.

Date: 08/18/2009 (765125) CN601214406

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 113, SubChapter C 113.110
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT F 63.100(b)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.130
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.162(g)(3)(ii)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.172(f)(1)(i)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.172(f)(1)(ii)
5C THSC Chapter 382 382.085(b)
STC 1A OP

Description: Failure to conduct monitoring of 16 valves and 97 connectors on the closed vent system within one quarter of installation date. Eastman reported that process and piping changes completed in July 2006, caused the 30-inch flare to become subject to 40 CFR 63, Subpart H.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 113, SubChapter C 113.100
30 TAC Chapter 113, SubChapter C 113.110
30 TAC Chapter 113, SubChapter C 113.130
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.11(b)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.7(a)(2)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT F 63.100(b)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.172(d)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.180(e)
5C THSC Chapter 382 382.085(b)
STC 1A OP
STC 4D OP

Description: Failure to conduct a flare performance test on the 30-inch flare within 180 days of the compliance date (October 31, 2006). Eastman reported that a piping change completed in October 2006 resulted in one relief valve being connected to the closed-vent system.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
SC 5F PERMIT
STC 7A OP

Description: Failure to conduct quarterly monitoring on 27 valves following process and piping changes in July 2006. Eastman reported that the installation of new piping on the fuel gas system to the building 52 Boilers caused 11 valves to become subject to monitoring in NSR Permit 1105. The installation also caused 16 valves on the closed-vent system to the flare to become subject to monitoring.

Date: 08/21/2009 (745360) CN601214406

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 113, SubChapter C 113.520
30 TAC Chapter 113, SubChapter C 113.560
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1033(b)(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT YY 63.1103(e)(3)

5C THSC Chapter 382 382.085(b)
STC 1E OP
STC 1F OP

Description: Failure to equip 8 open-ended lines and valves with a cap, blind flange, plug, or second valve. Eastman reported that on each the following days, an open-ended line was found and plugged: March 17, 2008, May 29, 2008, June 3, 2008, July 2, 2008, August 13, 2008, October 16 and 27, 2008, and December 2, 2008. These components only have federal applicability under 40 CFR 63, Subpart YY.

Date: 09/17/2009 (745361) CN601214406

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 113, SubChapter C 113.520
30 TAC Chapter 113, SubChapter C 113.890
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT FFFF 63.2480(a)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1024(a)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1029(b)(2)
5C THSC Chapter 382 382.085(b)
STC 1A OP

Description: Failure to make the first repair attempt within 5 days after leaks were found on seven connectors in heavy liquid HAP service.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 113, SubChapter C 113.520
30 TAC Chapter 113, SubChapter C 113.890
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT FFFF 63.2480(a)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1033(b)(1)
5C THSC Chapter 382 382.085(b)
SC 4E PERMIT
STC 1A OP
STC 8A OP

Description: Failure to equip 16 open-ended lines or valves with a cap, blind flange, plug, or second valve (one missing plug has State and Federal Applicability). Eastman reported that on each the following days, open-ended lines were found and plugged: 7/1/2008 (6), 7/15/2008 (2), 7/23/2008 (1), 8/21/2008 (1), 8/2/2008 (1), 9/8/2008 (4), and 11/19/2008 (1).

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.345(a)(1)(ii)
5C THSC Chapter 382 382.085(b)
STC 6A OP

Description: Failure to maintain each benzene waste container in a closed, sealed position, except when loading, removing, inspecting, or sampling the container. Eastman reported that an open benzene waste bucket was discovered on 4/23/2008 and was immediately transferred to a covered container. They also reported that on 6/10/2008, a drum was discovered with a lid that was not secured and sealed and immediately secured and latched the drum lid.

Date: 03/09/2010 (794113) CN601214406

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 113, SubChapter C 113.130
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)
5C THSC Chapter 382 382.085(b)
SC 10E PERMIT
STC 1A OP
STC 8 OP

Description: Failure to equip two open-ended lines with a blind flange. Eastman reported that on June 24, 2009, two flanges were found missing and blind flanges were installed, Eastman also reported that on October 9, 2008, one flange was found missing and a blind flange was installed. These components are subject to the HON requirements and NSR permit requirements.

Date: 03/09/2010 (794224) CN601214406

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 106, SubChapter S 106.433(5)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
STC 9A OP

Description: Failure to maintain the opacity limit below 5% while performing surface coating operations in the B-83 area. Eastman reported that during the 2008 third quarter opacity observation, Eastman personnel observed 8.10% opacity on August 14, 2008 while the contractor was performing spray painting. 30 TAC 106.433(5) limits the opacity to 5%. FOP O-01976, ST & C 9.A. requires that the permit holder meet the requirements of Permits by Rule. 30 TAC 122.143(4) requires compliance with the conditions o

Date: 03/11/2010 (794307) CN601214406

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
SC 8 PERMIT
STC 5 OP

Description: Failure to conduct monthly VOC sampling on the D-7B stripper effluent. Eastman reported that the August 2008 monthly sampling event was one day late in being caught and analyzed. The sample was caught and analyzed on September 1, 2008. NSR Permit 20567, Special Condition 8 requires that monthly sampling be conducted on the D-7B stripper effluent.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Part 60, Subpart VV 60.482-10
40 CFR Part 60, Subpart VV 60.482-4
40 CFR Part 60, Subpart VV 60.482-7
40 CFR Part 60, Subpart VV 60.482-8
5C THSC Chapter 382 382.085(b)
SC 6F and 6G PERMIT
STC 1 OP
STC 5 OP

Description: Failure to conduct monitoring on 289 valves, three pumps, 259 connectors, 3 pressure relief valves (PRV) and two agitators. The following were only subject to state regulations only: 285 valves, three pumps, 2 PRVs, and two agitators. The following are subject to federal regulations only: 259 connectors and four valves.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
SC 6E PERMIT
STC 8 OP

Description: Failure to equip 2 open-ended lines or valves with a cap, blind flange, plug, or second. Eastman reported that on each the following days, open-ended lines were found and plugged: 6/19/2009 (1), and 6/20/2009 (1). Both lines are state applicability only. NSR Permit 20567 SC 6E requires that each open-ended line or valve must be equipped with a cap, blind flange, plug, or second valve.

Date: 03/19/2010 (794309)

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-6(a)(1)
5C THSC Chapter 382 382.085(b)
SC 12E PERMIT
STC 10A OP
STC 1A OP

Description: Failure to equip two open-ended lines or valves with a cap, blind flange, plug, or second valve. Eastman reported that on December 5, 2008, two plugs were found missing and were replaced (all components have state and NSPS applicability). 40 CFR 60.482-6(a)(1) and NSR Permit 21832, SC12E require that each open-ended line or valve must be equipped with a cap, blind flange, plug, or

second valve.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(a)(1)
5C THSC Chapter 382 382.085(b)
SC 3F PERMIT
STC 10A OP
STC 1A OP

Description: Failure to monitor 62 valves in volatile organic compound (VOC) service from September 1, 2004 through January 31, 2009. Eastman reported that the valves were not monitored due to an Isobutyric Acid Plant addition to monitoring program and lack of follow-up on miscellaneous projects. The components were monitored by January 31, 2009. 40 CFR 60.482-7(a)(1) and NSR Permit 9631, SC 3F requires that the valves be monitored.

Date: 04/01/2010 (796513) CN601214406

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
STC 3A OP

Description: Failure to perform the fourth quarter 2008 visible emissions observations on the molten NPG tank truck loading spot. Eastman reported that they did not load after October 26, 2008 through the end of the fourth quarter and could therefore not perform the observation. An observation was performed Janauary 5, 2009. FOP O-01436, STC 3A requires the quarterly visible emissions observations. 30 TAC 122.143(4) requires compliance with the conditions of the FOP.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
SC 4A PERMIT
STC 10A OP

Description: Failure to limit the number of railcars washed that previously contained Product DTE Solvent. Eastman reported that during the period of May 1, 2008 through April 30, 2009, they washed six railcars and are only allowed to wash five railcars annually. NSR Permit 48758 SC 4A limits the number of railcars washed to the number specified in Attachment 1 of the permit. 30 TAC 116.115(c) and FOP O-01436 STC 10.A require compliance with the conditions of NSR permits. 30 TAC 122.143(4) requires com

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 113, SubChapter C 113.130
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)
5C THSC Chapter 382 382.085(b)
STC 1A OP

Description: Failure to equip two open-ended lines with a plug. Eastman reported that on October 28 and November 4, 2009, two plugs were found missing and plugs were installed upon discovery. These components are Federal requirements only. 40 CFR 63.167(a)(1) [40 CFR 63, Subpart H] requires that each open-ended line or valve must be equipped with a cap, blind flange, plug, or second valve.

Date: 05/11/2010 (800653) CN601214406

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 113, SubChapter C 113.620
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT EEE 63.1206(c)(3)(vii)
5C THSC Chapter 382 382.085(b)
STC 1D OP

Description: Failure to perform the weekly Automatic Waste Feed Cut Off (AWFCO) test on the RKI during the week of November 24, 2008. Eastman reported that they did not perform the test that week, but performed the test by December 1, 2008. 40 CFR 63.1206(c)(3)(vii) [40 CFR Part 63, Subpart EEE] requires that the AWFCO test be performed weekly. FOP O-01981 STC 1.D. and 30 TAC 113.620 require compliance with 40 CFR 63, Subpart EEE. 30 TAC 122.143(4) requires compliance with the conditions of the FOP.

Date: 06/17/2010 (824992) CN601214406

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
30 TAC Chapter 113, SubChapter C 113.520
30 TAC Chapter 113, SubChapter C 113.890
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-6(a)(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT FFFF 63.2480(a)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1033(b)(1)
48591 SC 5E PERMIT
5C THSC Chapter 382 382.085(b)
O-01968 STC 1A OP

Description: Failure to equip three open-ended lines with a cap, blind flange, plug, or second valve. Two of the components have state and federal applicability, the other has federal applicability only. Eastman reported that on June 24, 2009, two plugs were found missing and were replaced. On September 28, 2009, one plug was found missing and was replaced.

Date: 07/21/2010 (841323) CN601214406

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 113, SubChapter C 113.520
30 TAC Chapter 113, SubChapter C 113.890
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT FFFF 63.2480(a)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1033(b)(1)
5C THSC Chapter 382 382.085(b)
SC 4E PERMIT
SC 6E PERMIT
STC 10 OP
STC 1A OP

Description: Failure to equip 7 open-ended lines or valves with a cap, blind flange, plug, or second valve (four missing plugs also have State applicability). Eastman reported that on each the following days, open-ended lines were found and plugged: 11/9/2009 (2), 11/10/2009 (1), 1/5/2010 (2), 1/22/2010 (1), and 2/20/2010 (1).

Date: 07/21/2010 (841505) CN601214406

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 113, SubChapter C 113.520
30 TAC Chapter 113, SubChapter C 113.560
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1033(b)(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT YY 63.1103(e)(3)
5C THSC Chapter 382 382.085(b)
STC 1A OP

Description: Failure to equip 51 open-ended lines and valves with a cap, blind flange, plug, or second valve. Eastman reported that on each of the following days, open-ended line were found and plugged: March 25, 2009 (1), May 18, 2009 (1), July 15, 2009 (1), July 27, 2009 (7), August 20, 2009 (15), August 24, 2009 (3), August 26, 2009 (14), November 16, 2009 (7), December 8, 2009 (1), and February 18, 2010 (1).

Date: 10/26/2010 (870315) CN601214406

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 106, SubChapter A 106.6(b)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)

Description: Failure to equip one open-ended line with a valve, plug, or blind flange. Eastman reported that on November 10, 2009, one open-ended line was found and a plug was installed upon discovery. The line was authorized under Permit by rule (PBR) 80164 which was certified. Eastman represented that they would plug all open-ended lines, therefore they deviated from their representation.

Date: 10/26/2010 (870211) CN601214406

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
STC 6 OP

Description: Failure to perform the monthly NOx monitoring on Boiler 11. Eastman reported that they failed to perform the monthly NOx monitoring on Boiler 11 when the unit was unexpectedly shutdown on August 22, 2009 due to a tube leak. FOP O-01970 STC 6 requires that Eastman comply with the periodic monitoring requirements specified in the FOP. The FOP requires that NOx monitoring shall be performed on a monthly basis. 30 TAC 122.143(4) requires compliance with the conditions of the FOP.

Date: 10/27/2010 (870477) CN601214406

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
SC 8 PERMIT
STC 7 OP

Description: Failure to conduct monthly VOC sampling on the D-7B stripper effluent. Eastman reported that the December 2009 monthly sampling was not performed. The unit had been down from December 2 through December 26, 2009, but the sampling was not conducted after startup. NSR Permit 20567, Special Condition 8 requires that monthly sampling be conducted on the D-7B stripper effluent.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
SC 6E PERMIT
STC 8 OP

Description: Failure to equip one open-ended line with a cap, blind flange, plug, or second. Eastman reported that on January 19, 2010, an open-ended line was found and plugged. The line has state applicability only. NSR Permit 20567 SC 6E requires that each open-ended line or valve must be equipped with a cap, blind flange, plug, or second valve. FOP O-01972 STC 8 requires compliance with the conditions of an NSR permit. 30 TAC 122.143(4) requires compliance with the conditions of the FOP.

Date: 10/27/2010 (870637) CN601214406

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-6(a)(1)
5C THSC Chapter 382 382.085(b)
SC 12E PERMIT
SC 3 PERMIT
SC 3E PERMIT
SC 6E PERMIT
STC 11 OP
STC 1A OP
STC 6B PERMIT

Description: Failure to equip four open-ended lines or valves with a cap, blind flange, plug, or second valve. Eastman reported that on the following days, open-ended lines were discovered and were immediately plugged: December 15, 2009 (one plug), April 5, 2010 (one plug, June 24, 2001 (one plug), and June 30, 2010 (one plug). The components have state and NSPS applicability.

Date: 11/04/2010 (870754) CN601214406

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 113, SubChapter C 113.120
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.120(a)(2)(i)
5C THSC Chapter 382 382.085(b)
STC 1A OP

Description: Failure to conduct annual visual observations of the internal floating roof on two tanks. Eastman reported that the last inspections were conducted on March 31, 2009, but did not conduct the subsequent one until April 5, 2010. 40 CFR 62.120(a)(2)(i) [40 CFR 63, Subpart G] requires that the internal floating roofs be observed at least once every 12 months. 30 TAC 113.120 requires compliance with 40 CFR 63, Subpart G.

Date: 11/08/2010 (872479) CN601214406

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
30 TAC Chapter 122, SubChapter B 122.145(1)(C)
5C THSC Chapter 382 382.085(b)
GC OP

Description: Failure to submit a 40 CFR 63, Subpart H semiannual report within 30 days after the period ended. During the review of the report, the investigator documented that Eastman failed to submit the report within the required timeframe. 30 TAC 122.145(1)(C) states unless otherwise specified in the permit (Title V Permit), the following reporting requirements shall become terms and conditions of the permit.

Date: 03/09/2011 (900737) CN601214406

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 113, SubChapter C 113.120
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.128(a)
5C THSC Chapter 382 382.085(b)
STC 1A OP

Description: Failure to conduct a performance test on the Oxoaldehyde flare when the transfer racks are vented to the flare. Eastman reported that they performed a test on the flare on August 21, 1997, but the flare was only tested when storage tanks were being vented to the flare. Eastman performed the test on November 18, 2010. 40 CFR 63.128(a) [40 CFR 63, Subpart G] requires that a performance test be conducted for the control device when transfer operations are vented to the device.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 106, SubChapter O 106.355(5)(C)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
STC 13 OP

Description: Failure to maintain records of time and duration of maintenance activities on the Building 42 pipeline flare. Eastman reported that they failed to maintain the record of time and duration of the activities. 30 TAC 106.355(5)(C) requires that records shall be maintained of the time and duration of maintenance activities. FOP O-01436 STC 13 requires compliance with the conditions of Permit by Rules (PBRs). 30 TAC 122.143(4) requires compliance with the conditions of the FOP.

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 111, SubChapter A 111.111(a)(4)(A)(ii)
30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
STC 1A OP

Description: Failure to maintain records of the time that visible emissions observations were conducted on the Building 42 pipeline flare. Eastman reported that they failed to maintain a record of the time the visible emissions observations were conducted. Eastman started keeping the records On September 1, 2010. 30 TAC 111.111(a)(4)(A)(ii) requires that a record be maintained of the date and time of the visible emissions observation on a flare. FOP O-01436 STC 1A requires the permit holder to comply wi

Date: 04/19/2011 (893872) CN601214406

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 113, SubChapter C 113.130
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.167(a)(1)
5C THSC Chapter 382 382.085(b)
SC 10E PERMIT
SC 4 PERMIT
STC 1A OP
STC 8 OP

Description: Failure to equip seventeen open-ended lines with a cap, blind flange, plug, or second valve. Eastman reported that on September 23, 2009, one flange was found missing and a blind flange was installed, Eastman also reported that on February 2, 2010, fifteen open-ended lines were found and a second block valve or missing plug was installed, Eastman also reported that on June 14, 2010, one open-ended line was found and a blind flange was installed.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(2)
30 TAC Chapter 122, SubChapter B 122.143(4)

40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.354(a)(1)
5C THSC Chapter 382 382.085(b)
STC 1A OP

Description: Failure to perform monthly sampling to determine the benzene concentration on the E-507 stripper during the month of October 2009. Eastman reported that they failed to perform the monthly sampling during October 2009. 40 CFR 61.354(a)(1) requires that the benzene concentration exiting the treatment process be measured monthly. 30 TAC 101.20(2) requires compliance with 40 CFR 61. FOP O-01971, ST&C 1.A. requires the permit holder to comply with applicable requirements contained in the permit.

Date: 05/11/2011 (914198) CN601214406

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 113, SubChapter C 113.620
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT EEE 63.1209(b)(2)
5C THSC Chapter 382 382.085(b)
STC 1A OP

Description: Failure to perform the annual calibration on the scrubber steam flow meter for the RKI. Eastman reported that the calibration was due to be conducted by September 18, 2009, but was not conducted until December 3, 2009. 40 CFR 63.1209(b)(2) [40 CFR Part 63, Subpart EEE] requires the operator to follow the manufacturer's recommendation for calibrations (annual basis). FOP O-01981 STC 1.A. requires compliance with the applicable requirements contained in the permit. 30 TAC 113.620 require com

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 122, SubChapter B 122.143(4)
5C THSC Chapter 382 382.085(b)
STC 3C(iii)(1) OP

Description: Failure to perform the Second Quarter 2010 visible emissions. Eastman reported that they failed to perform the observation of the Talley 1A landfill during the quarter. FOP O-01981 STC 3C(iii)(1) requires the observation to be performed quarterly unless the source is not operating for the entire quarter. Eastman reported that the landfill was in operation for six days during the quarter. 30 TAC 122.143(4) requires compliance with the conditions of the FOP.

Date: 05/12/2011 (914858) CN601214406

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-6(a)(1)
5C THSC Chapter 382 382.085(b)
SC 5E PERMIT
STC 1A OP
STC 8A OP

Description: Failure to equip six open-ended lines with a cap, blind flange, plug, or second valve. All of the components have state and federal applicability. Eastman reported that missing plugs were found and replaced on the following days: November 7, 2010 (one plug); January 28, 2011 (three plugs), and January 23, 2011 (two plugs).

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 113, SubChapter C 113.520
30 TAC Chapter 113, SubChapter C 113.890
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT FFFF 63.2480(a)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1022(c)(4)(ii)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1025(e)(2)
5C THSC Chapter 382 382.085(b)
STC 1A OP

Description: Failure to monitor three difficult to monitor (DTM) valves in the propanol process. Eastman reported that the valves should have been monitored during the second half of 2010, but the valves were not monitored until January 19, 2011. 40 CFR 63.1025(e)(2) [40 CFR 63 Subpart UU] states that the owner or operator shall monitor the DTM valves according to the written plan.

Date: 05/16/2011 (914970) CN601214406

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 113, SubChapter C 113.520

30 TAC Chapter 113, SubChapter C 113.890
30 TAC Chapter 116, SubChapter B 116.115(c)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT FFFF 63.2480(a)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1033(b)(1)
5C THSC Chapter 382 382.085(b)
SC 4E PERMIT
STC 1A OP

Description: Failure to equip 10 open-ended lines or valves with a cap, blind flange, plug, or second valve (three open-ended lines also have State applicability). Eastman reported that on each the following days, open-ended lines were found and plugged: 03/3/2010 (2), 07/10/2010 (2), 8/7/2010 (1), 8/26/2010 (1), 8/27/2010 (1), 9/6/2010 (1), 11/3/2010 (1) and 11/26/2010 (1). 40 CFR 63.2480(a) [40 CFR 63, Subpart FFFF] requires compliance with Subparts H or UU (Eastman chose Subpart UU).

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 113, SubChapter C 113.520
30 TAC Chapter 113, SubChapter C 113.890
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT FFFF 63.2480(a)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1024(a)
5C THSC Chapter 382 382.085(b)
STC 1A OP

Description: Failure to make the first attempt at repair within 5 days after a leak is detected on one relief valve in HAP service. Eastman reported that the valve was found leaking on February 2, 2010, but no first attempt at repair was performed. 40 CFR 63.2480(a) [40 CFR 63, Subpart FFFF] requires compliance with Table 6 of Subpart FFFF.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.345(a)(1)(i)
5C THSC Chapter 382 382.085(b)
STC 6A OP

Description: Failure to determine if the cover and all openings of a fiber drum containing benzene waste had no detectable emissions as indicated by a reading of less than 500 ppmv. Eastman reported that the drum was loaded with filter elements and was sent to the incinerator. The drum was not monitored prior to incineration. 40 CFR 61.345(a)(1)(i) [40 CFR 61, Subpart FF] requires that the no detectable emissions be determined by monitoring initially. 30 TAC 101.20(2) requires compliance with 40 CFR 61

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.345(a)(1)(ii)
5C THSC Chapter 382 382.085(b)
STC 6A OP

Description: Failure to maintain the cover and all openings of a container containing benzene waste in a closed, sealed position. Eastman reported that waste was removed from a heat treater and placed in a container and the cap was not properly closed. 40 CFR 61.345(a)(1)(ii) [40 CFR 61, Subpart FF] requires each opening shall be maintained in a closed, sealed position at all times that waste is in the container. 30 TAC 101.20(2) requires compliance with 40 CFR 61.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.20(1)
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.345(a)(1)(i)
5C THSC Chapter 382 382.085(b)
STC 6A OP

Description: Failure to determine if the cover and all openings of two portable tanks containing benzene waste had no detectable emissions as indicated by a reading of less than 500 ppmv. Eastman reported that the two tanks were emptied and washed prior to monitoring. 40 CFR 61.345(a)(1)(i) [40 CFR 61, Subpart FF] requires that the no detectable emissions be determined by monitoring initially. 30 TAC 101.20(2) requires compliance with 40 CFR 61. FOP O-01972, ST&C 6.A. requires the permit holder to comp

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 113, SubChapter C 113.520
30 TAC Chapter 113, SubChapter C 113.890
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT FFFF 63.2480(a)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1022(c)(4)(ii)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1025(e)(2)
5C THSC Chapter 382 382.085(b)
SSTC 1A OP

Description: Failure to monitor 186 difficult to monitor (DTM) valves in the Eastotac process. Eastman reported that the valves were scheduled to be monitored in the second half of 2010, but were not monitored until January 24 - 27, 2011. 40 CFR 63.2480(a) [40 CFR 63, Subpart FFFF] requires compliance with Table 6 of Subpart FFFF. 40 CFR 63, Subpart FFFF, Table 6 - 1a requires compliance with 40 CFR 63, Subpart UU.

Date: 05/17/2011 (915195) CN601214406

Self Report? NO Classification: Minor

Citation: 30 TAC Chapter 113, SubChapter C 113.520
30 TAC Chapter 113, SubChapter C 113.560
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1033(b)(1)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT YY 63.1103(e)(3)
5C THSC Chapter 382 382.085(b)
STC 1A OP

Description: Failure to equip 13 open-ended lines and valves with a cap, blind flange, plug, or second valve. Eastman reported that on each the following days, open-ended line were found and plugged: day: April 13, 2010 (1), April 16, 2010 (1), April 26, 2010 (1), June 15, 2010 (1), July 26, 2010 (1), September 8, 2010 (1), January 13, 2011 (5), and January 26, 2011 (2). These components only have federal applicability under 40 CFR 63, Subpart YY.

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 113, SubChapter C 113.520
30 TAC Chapter 113, SubChapter C 113.560
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1025(b)(3)(iii)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT YY 63.1103(e)(3)
5C THSC Chapter 382 382.085(b)
STC 1A OP

Description: Failure to monitor nine instrument valves that had been listed as exempt from monitoring, but were not exempt. These components only have federal applicability under 40 CFR 63, Subpart YY. 40 CFR 63.1103(e)(3) [40 CFR 63, Subpart YY] requires compliance with 40 CFR 63, Subpart UU. 40 CFR 63.1025(b)(3)(iii) [40 CFR 63, Subpart UU] states if the percent leaking valves is less than 1%, they may elect to monitor once every two quarters.

Date: 08/05/2011 (937020) CN601214406

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 113, SubChapter C 113.130
30 TAC Chapter 122, SubChapter B 122.143(4)
40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.174(d)
5C THSC Chapter 382 382.085(b)

Description: Failure to make the first attempt at repair within 5 days after a leak is detected and failure to repair a component within 15 days after the leak was discovered on one connector in HAP service. Eastman reported that the flange was found leaking on May 19, 2010 and the gasket was replaced the same day. The flange was not monitored to verify that the leak was repaired until June 10, 2010, 22 days after the flange was found leaking.

Date: 08/26/2011 (948574) CN601214406

Self Report? NO Classification: Moderate

Citation: 30 TAC Chapter 335, SubChapter A 335.6(c)

Description: Failure to provide notice of any changes or additional information concerning waste management units.

F. Environmental audits.

Notice of Intent Date: 01/27/2009 (739302)
Disclosure Date: 03/27/2009
Viol. Classification: Moderate
Rqmt Prov: PERMIT NSR Permit 1105

Description: Failure to identify and/or monitor approximately 900 components as part of the Leak Detection and Repair Programs for the Oxo Aldehydes area.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.181

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.182

Rqmt Prov: PERMIT NSR Permit 1105

Description: Failure to maintain records and/or complete reporting for 718 components as part of the Leak Detection and Repair Programs for the Oxo Aldehydes area.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.144

Rqmt Prov: PERMIT Air Operating Permit O-1982

Description: Failure to maintain records of quarterly visible emissions observations on the C7 and C9 compressor engine stacks.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.181

Rqmt Prov: PERMIT NSR Permit 1105

Description: Failure to maintain records of the corrective actions taken to repair leaks found on 05/08/2007, 10/05/2007 and 10/17/2007.

Viol. Classification: Moderate

Citation: 40 CFR Part 63, Subpart H 63.171

Description: Failure to confirm repair of components repaired with 15 days of leak discovery.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 106, SubChapter K 106.261

30 TAC Chapter 106, SubChapter K 106.262

30 TAC Chapter 106, SubChapter A 106.6

30 TAC Chapter 106, SubChapter A 106.8

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.160

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.181

Description: Failure to authorize the additions of new components or failure to monitor components in the field under an LDAR Program.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 122, SubChapter B 122.145(2)

Description: Failure to include accurate data on the Semiannual Deviation Report dated 8/29/08 for FOP O1982.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.10

30 TAC Chapter 106, SubChapter K 106.261

30 TAC Chapter 116, SubChapter B 116.115(c)

30 TAC Chapter 122, SubChapter B 122.143(4)

Rqmt Prov: PERMIT NSR Permit 1105

Description: Failure to correctly report the carbon monoxide emissions from EPNs F053FG1, F053FG7 and F062FG1.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 101, SubChapter A 101.10

Rqmt Prov: PERMIT Air Permit 1105

PERMIT Permit by Rule 87404

Description: Failure to correctly calculate the VOC emissions for EPN 022T114.

Viol. Classification: Moderate

Citation: 30 TAC Chapter 335, SubChapter J 335.328

Description: Failure to report the Oxo Aldehydes Hazardous Waste Stream No. 50-187 into the waste management database; therefore, failing to pay the hazardous waste incineration fee.

Viol. Classification: Minor

Citation: 30 TAC Chapter 111, SubChapter A 111.111(a)(4)(A)

Description: Failure to consistently record the actual time of flare observations in the Oxo Aldehydes area for flares 005FL1, 005FL2 and 027FL1.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT G 63.138

Description: Failure to correctly report in the HON Semi-annual report correct data for the D-20 Design Steam Stripper and a diversion of a Group 1 HON Wastewater Stream to the Process Sewer.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT A 63.11(b)

Description: Failure to maintain records to show compliance with the minimum heat content requirements and the maximum velocity for the process gas being sent to flares 005FL1 and 027FL1.

Notice of Intent Date: 07/17/2009 (764033)
Disclosure Date: 12/07/2009

Viol. Classification: Minor
Rqmt Prov: PERMIT Special Condition

Description: Failure to accurately record the times of the equipment checks.

Viol. Classification: Moderate
Citation: 30 TAC Chapter 106, SubChapter A 106.8(c)

Rqmt Prov: PERMIT STC-8

Description: Failure to maintain records on-site, which documented permit by rules for two pieces of equipment.

Viol. Classification: Moderate
Citation: 30 TAC Chapter 111, SubChapter A 111.111(a)(1)(B)

Description: Failure to perform quarterly monitoring for visible emissions.

Notice of Intent Date: 08/17/2009 (768015)
Disclosure Date: 03/26/2010

Viol. Classification: Moderate
Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.345(a)(1)(i)

Rqmt Prov: PERMIT O-01972

Description: Failure to monitor all NESHAP FF applicable containers.

Notice of Intent Date: 08/24/2009 (768034)
Disclosure Date: 01/26/2010

Viol. Classification: Moderate
Rqmt Prov: PERMIT NSR 681

Description: Failure to obtain authorization to meet the VOC emission limits for EPN 035S703 within MAERT for TCEQ NSR Air Permit No. 681.

Notice of Intent Date: 08/24/2009 (768036)
No DOV Associated

Notice of Intent Date: 09/17/2009 (777732)
Disclosure Date: 02/09/2010

Viol. Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)

Rqmt Prov: PERMIT NSR Permits

PERMIT Title V Permits

Description: Failure to properly record and/or timely repair leaking components found by audio, visual, and/or olfactory means.

Viol. Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)

Description: Failed to monitor 13 MON valves and approximately 326 MON CVS sources for the LDAR Program required by the Miscellaneous Organic NESHAP.

Disclosure Date: 02/26/2010

Viol. Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)

Rqmt Prov: PERMIT STC- 1A

Description: Failure to ensure the complete biennial monitoring of the connectors within the Propionic Acid Plant. Specifically, only 38 of the 319 connectors were monitored during the third quarter of 2009.

Viol. Classification: Moderate
Citation: 30 TAC Chapter 116, SubChapter B 116.115(b)

Description: Failure to adequately maintain records of the LDAR Database.
Disclosure Date: 09/23/2010

Viol. Classification: Moderate
Citation: 30 TAC Chapter 106, SubChapter K 106.261

30 TAC Chapter 106, SubChapter K 106.262

40 CFR Chapter 265, SubChapter I, PT 265, SubPT BB 265.1062(b)(3)

40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.482-7(c)(1)(i)

40 CFR Chapter 60, SubChapter C, PT 60, SubPT VV 60.483-2(a)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1025(b)(3)(i)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1025(b)(3)(ii)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1025(b)(3)(iv)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1027(a)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1027(b)(3)(i)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1030(c)(1)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT H 63.168(d)(4)

40 CFR Chapter 63, SubChapter C, PT 63, SubPT SS 63.983(b)(1)

Description: Failure to conduct initial, initial annual, annual, semi-annual, quarterly, and/or monthly monitoring for various connectors and valves throughout the Texas Operations facility.

Viol. Classification: Moderate

Citation: 40 CFR Chapter 63, SubChapter C, PT 63, SubPT UU 63.1030(c)(1)

Description: Failure to make a final repair or place on Delay of Repair within five days or confirm repair within five days for one relief valve at HCC-3. The relief valve was found leaking on November 6, 2007 and not placed on Delay of Repair until November 20, 2007. Additionally, Eastman failed to make a final repair within 15 days or place the component on Delay of Repair for one pump that was found leaking on June 9, 2006 and not confirmed as repaired until July 5, 2006.

Notice of Intent Date: 03/11/2010 (802745)
No DOV Associated

Notice of Intent Date: 04/28/2010 (826837)
No DOV Associated

Notice of Intent Date: 05/12/2010 (873014)
Disclosure Date: 01/19/2011

Viol. Classification: Moderate

Citation: 40 CFR Chapter 61, SubChapter C, PT 61, SubPT FF 61.354(a)(1)

40 CFR Part 61, Subpart FF 61.355(c)(3)

Description: Failure to ensure that the monthly samples of the E-507 wastewater stripper are collected and analyzed in triplicate instead of the duplicate samples that have been collected.

Notice of Intent Date: 08/31/2010 (760326)
No DOV Associated

Notice of Intent Date: 06/24/2011 (936762)
No DOV Associated

Notice of Intent Date: 07/21/2011 (936955)
No DOV Associated

G. Type of environmental management systems (EMSs).

02/28/2005	05/15/2014	ENVIRONMENTAL MANAGEMENT SYSTEM	NON 30 TAC CH 90 CERTIFIED

H. Voluntary on-site compliance assessment dates.

N/A

I. Participation in a voluntary pollution reduction program.

N/A

J. Early compliance.

N/A

Sites Outside of Texas

N/A

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

IN THE MATTER OF AN ENFORCEMENT ACTION CONCERNING EASTMAN CHEMICAL COMPANY RN100219815	**§ § § § §**	**BEFORE THE TEXAS COMMISSION ON ENVIRONMENTAL QUALITY**

AGREED ORDER
DOCKET NO. 2011-1691-AIR-E

I. JURISDICTION AND STIPULATIONS

At its _____ agenda, the Texas Commission on Environmental Quality ("the Commission" or "TCEQ") considered this agreement of the parties, resolving an enforcement action regarding Eastman Chemical Company ("the Respondent") under the authority of TEX. HEALTH & SAFETY CODE ch. 382 and TEX. WATER CODE ch. 7. The Executive Director of the TCEQ, through the Enforcement Division, and the Respondent appear before the Commission and together stipulate that:

1. The Respondent owns and operates a chemical manufacturing plant at 300 Kodak Boulevard in Longview, Harrison County, Texas (the "Plant").

2. The Plant consists of one or more sources as defined in TEX. HEALTH & SAFETY CODE § 382.003(12).

3. The Commission and the Respondent agree that the Commission has jurisdiction to enter this Agreed Order, and that the Respondent is subject to the Commission's jurisdiction.

4. The Respondent received notice of the violations alleged in Section II ("Allegations") on or about August 15, 2011.

5. The occurrence of any violation is in dispute and the entry of this Agreed Order shall not constitute an admission by the Respondent of any violation alleged in Section II ("Allegations"), nor of any statute or rule.

6. An administrative penalty in the amount of Sixty-Four Thousand Five Hundred Thirty-Three Dollars ($64,533) is assessed by the Commission in settlement of the violations alleged in Section II ("Allegations"). The Respondent has paid Twenty-Five Thousand

Eight Hundred Fourteen Dollars ($25,814) of the administrative penalty and Twelve Thousand Nine Hundred Six Dollars ($12,906) is deferred contingent upon the Respondent's timely and satisfactory compliance with all the terms of this Agreed Order. The deferred amount will be waived upon full compliance with the terms of this Agreed Order. If the Respondent fails to timely and satisfactorily comply with all requirements of this Agreed Order, the Executive Director may require the Respondent to pay all or part of the deferred penalty. Twenty-Five Thousand Eight Hundred Thirteen Dollars ($25,813) shall be conditionally offset by the Respondent's completion of a Supplemental Environmental Project ("SEP").

7. Any notice and procedures, which might otherwise be authorized or required in this action, are waived in the interest of a more timely resolution of the matter.

8. The Executive Director of the TCEQ and the Respondent have agreed on a settlement of the matters alleged in this enforcement action, subject to the approval of the Commission.

9. The Executive Director recognizes that the Respondent has implemented the following corrective measures at the Plant:

   a. On August 4, 2011, car-sealed the vent valve and added the valve to the car-seal checklist requiring that it must be closed and checked off prior to startup;

   b. On August 4, 2011, relocated the vent valve from the residual system checklist to the D-509 bleed valve checklist to improve communications;

   c. On August 4, 2011, provided additional training to the operators to ensure that valve positions are recorded properly in the bleed valve checklists and to emphasize communication of items that are not completed on the bleed valve checklists; and

   d. On August 5, 2011, changed the log book recording process to improve communications of critical process information during turnarounds.

10. The Executive Director may, without further notice or hearing, refer this matter to the Office of the Attorney General of the State of Texas ("OAG") for further enforcement proceedings if the Executive Director determines that the Respondent has not complied with one or more of the terms or conditions in this Agreed Order.

11. This Agreed Order shall terminate five years from its effective date or upon compliance with all the terms and conditions set forth in this Agreed Order, whichever is later.

12. The provisions of this Agreed Order are deemed severable and, if a court of competent jurisdiction or other appropriate authority deems any provision of this Agreed Order unenforceable, the remaining provisions shall be valid and enforceable.

II. ALLEGATIONS

As owner and operator of the Plant, the Respondent is alleged to have failed to prevent unauthorized emissions during an emissions event (Incident No. 154284) that was discovered on May 8, 2011, in violation of 30 TEX. ADMIN. CODE §§ 116.115(c) and 122.143(4), New Source Review Permit No. 1329 Special Conditions No. 1; Federal Operating Permit No. O-01974 Special Terms and Conditions No. 8, and TEX. HEALTH & SAFETY CODE § 382.085(b), as documented during a record review conducted on July 25, 2011. Specifically, during startup on February 19, 2011, a vent valve was not aligned to vent the Ethylene Oxide Refining Column emissions to the residual system and back to the process. The emissions are estimated to be 16,969 pounds of ethylene oxide. Because the event could have been avoided by better operating practices, the Respondent did not meet the affirmative defense in 30 TEX. ADMIN. CODE § 101.222.

III. DENIALS

The Respondent generally denies each allegation in Section II ("Allegations").

IV. ORDERING PROVISIONS

1. It is, therefore, ordered by the TCEQ that the Respondent pay an administrative penalty as set forth in Section I, Paragraph 6 above. The payment of this administrative penalty and the Respondent's compliance with all the terms and conditions set forth in this Agreed Order resolve only the allegations in Section II. The Commission shall not be constrained in any manner from requiring corrective action or penalties for violations which are not raised here. Administrative penalty payments shall be made payable to "TCEQ" and shall be sent with the notation "Re: Eastman Chemical Company, Docket No. 2011-1691-AIR-E" to:

   Financial Administration Division, Revenues Section
   Attention: Cashier's Office, MC 214
   Texas Commission on Environmental Quality
   P.O. Box 13088
   Austin, Texas 78711-3088

2. The Respondent shall implement and complete a SEP in accordance with TEX. WATER CODE § 7.067. As set forth in Section I, Paragraph 6 above, Twenty-Five Thousand Eight Hundred Thirteen Dollars ($25,813) of the assessed administrative penalty shall be offset with the condition that the Respondent implement the SEP defined in Attachment A, incorporated herein by reference. The Respondent's obligation to pay the conditionally offset portion of the administrative penalty assessed shall be discharged upon final completion of all provisions of the SEP agreement.

3. The provisions of this Agreed Order shall apply to and be binding upon the Respondent. The Respondent is ordered to give notice of the Agreed Order to personnel who maintain day-to-day control over the Plant operations referenced in this Agreed Order.

4. If the Respondent fails to comply with any of the Ordering Provisions in this Agreed Order within the prescribed schedules, and that failure is caused solely by an act of God, war, strike, riot, or other catastrophe, the Respondent's failure to comply is not a violation of this Agreed Order. The Respondent shall have the burden of establishing to the Executive Director's satisfaction that such an event has occurred. The Respondent shall notify the Executive Director within seven days after the Respondent becomes aware of a delaying event and shall take all reasonable measures to mitigate and minimize any delay.

5. The Executive Director may grant an extension of any deadline in this Agreed Order or in any plan, report, or other document submitted pursuant to this Agreed Order, upon a written and substantiated showing of good cause. All requests for extensions by the Respondent shall be made in writing to the Executive Director. Extensions are not effective until the Respondent receives written approval from the Executive Director. The determination of what constitutes good cause rests solely with the Executive Director.

6. This Agreed Order, issued by the Commission, shall not be admissible against the Respondent in a civil proceeding, unless the proceeding is brought by the OAG to: (1) enforce the terms of this Agreed Order; or (2) pursue violations of a statute within the Commission's jurisdiction, or of a rule adopted or an order or permit issued by the Commission under such a statute.

7. This Agreed Order may be executed in separate and multiple counterparts, which together shall constitute a single instrument. Any page of this Agreed Order may be copied, scanned, digitized, converted to electronic portable document format ("pdf"), or otherwise reproduced and may be transmitted by digital or electronic transmission, including but not limited to facsimile transmission and electronic mail. Any signature affixed to this Agreed Order shall constitute an original signature for all purposes and may be used, filed, substituted, or issued for any purpose for which an original signature could be used. The term "signature" shall include manual signatures and true and accurate reproductions of manual signatures created, executed, endorsed, adopted, or authorized by the person or persons to whom the signatures are attributable. Signatures may be copied or reproduced digitally, electronically, by photocopying, engraving, imprinting, lithographing, electronic mail, facsimile transmission, stamping, or any other means or process which the Executive Director deems acceptable. In this paragraph exclusively, the terms "electronic transmission", "owner", "person", "writing", and "written" shall have the meanings assigned to them under TEX. BUS. ORG. CODE § 1.002.

8. Under 30 TEX. ADMIN. CODE § 70.10(b), the effective date is the date of hand-delivery of the Order to the Respondent, or three days after the date on which the Commission mails notice of the Order to the Respondent, whichever is earlier. The Chief Clerk shall provide a copy of this Agreed Order to each of the parties.

SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission

For the Executive Director

Date

I, the undersigned, have read and understand the attached Agreed Order. I am authorized to agree to the attached Agreed Order on behalf of the entity indicated below my signature, and I do agree to the terms and conditions specified therein. I further acknowledge that the TCEQ, in accepting payment for the penalty amount, is materially relying on such representation.

I also understand that failure to comply with the Ordering Provisions, if any, in this order and/or failure to timely pay the penalty amount, may result in:

- A negative impact on compliance history;
- Greater scrutiny of any permit applications submitted;
- Referral of this case to the Attorney General's Office for contempt, injunctive relief, additional penalties, and/or attorney fees, or to a collection agency;
- Increased penalties in any future enforcement actions;
- Automatic referral to the Attorney General's Office of any future enforcement actions; and
- TCEQ seeking other relief as authorized by law.

In addition, any falsification of any compliance documents may result in criminal prosecution.

Signature

12/8/11
Date

C. David Crouch
Name (Printed or typed)
Authorized Representative of
Eastman Chemical Company

Supt., TXO Chemicals Division
Title

Instructions: Send the original, signed Agreed Order with penalty payment to the Financial Administration Division, Revenues Section at the address in Section IV, Paragraph 1 of this Agreed Order.

Attachment A
Docket Number: 2011-1691-AIR-E

SUPPLEMENTAL ENVIRONMENTAL PROJECT

Respondent:	**Eastman Chemical Company**
Penalty Amount:	**Fifty-One Thousand Six Hundred Twenty-Seven Dollars ($51,627)**
SEP Offset Amount:	**Twenty-Five Thousand Eight Hundred Thirteen Dollars ($25,813)**
Type of SEP:	**Pre-approved**
Third-Party Recipient:	**Texas PTA – *Texas PTA Clean School Buses***
Location of SEP:	**Texas Air Quality Control Region 022 – Shreveport – Texarkana - Tyler**

The Texas Commission on Environmental Quality ("TCEQ") agrees to offset a portion of the administrative Penalty Amount assessed in this Agreed Order for the Respondent to contribute to a Supplemental Environmental Project ("SEP"). The offset is equal to the SEP Offset Amount set forth above and is conditioned upon completion of the project in accordance with the terms of this Attachment A.

1. Project Description

A. Project

The Respondent shall contribute the SEP Offset Amount to the Third-Party Recipient named above. The contribution will be to **Texas PTA** for the *Texas PTA Clean School Bus Program* as set forth in an agreement between the Third-Party Recipient and the TCEQ. Specifically, the contribution will be used to reimburse local school districts for the cost of the following activities to reduce emissions: 1) replacing older diesel buses with alternative fueled or clean diesel buses; or 2) retrofitting older diesel buses with new, cleaner technology. All dollars contributed will be used solely for the direct cost of the project and no portion will be spent on administrative costs. The SEP will be done in accordance with all federal, state and local environmental laws and regulations.

The Respondent certifies that it has no prior commitment to make this contribution and that it is being done solely in an effort to settle this enforcement action.

B. Environmental Benefit

This SEP will provide a discernible environmental benefit by reducing particulate emissions from buses by more than 90% below today's level and by reducing hydrocarbons.

C. Minimum Expenditure

The Respondent shall contribute at least the SEP Offset Amount to the Third-Party Recipient and comply with all other provisions of this SEP.

2. Performance Schedule

Within 30 days after the effective date of this Agreed Order, the Respondent must contribute the SEP Offset Amount to the Third-Party Recipient. The Respondent shall mail a copy of the Agreed Order with the contribution to:

Director of Finance
Texas PTA
408 West 11th Street
Austin, Texas 78701

3. Records and Reporting

Concurrent with the payment of the SEP Offset Amount, the Respondent shall provide the Enforcement Division SEP Coordinator with a copy of the check and transmittal letter indicating full payment of the SEP Offset Amount to the Third-Party Recipient. The Respondent shall mail a copy of the check and transmittal letter to:

Enforcement Division
Attention: SEP Coordinator, MC 219
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, Texas 78711-3087

4. Failure to Fully Perform

If the Respondent does not perform its obligations under this SEP in any way, including full expenditure of the SEP Offset Amount and submittal of the required reporting described in Section 3 above, the Executive Director may require immediate payment of all or part of the SEP Offset Amount.

In the event of incomplete performance, the Respondent shall include on the check the docket number of this Agreed Order and a note that it is for reimbursement of a SEP. The Respondent shall make the payment for the amount due to "Texas Commission on Environmental Quality" and mail it to:

Litigation Division
Attention: SEP Coordinator, MC 175
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, Texas 78711-3087

5. Publicity

Any public statements concerning this SEP made by or on behalf of the Respondent must include a clear statement that the project was performed as part of the settlement of an enforcement action brought by the TCEQ. Such statements include advertising, public relations, and press releases.

6. Clean Texas Program

The Respondent shall not include this SEP in any application made to TCEQ under the "Clean Texas" (or any successor) program(s). Similarly, the Respondent may not seek recognition for this contribution in any other state or federal regulatory program.

7. Other SEPs by TCEQ or Other Agencies

The SEP identified in this Agreed Order has not been, and shall not be, included as a SEP for the Respondent under any other Agreed Order negotiated with the TCEQ or any other agency of the state or federal government.